



**HILLINGDON**  
LONDON

**Hillingdon Adult and Community Learning  
Staying Safe Strategy and Policy 2020-24**

<b>Contents</b>	<b>Page no</b>
<b>Staying Safe Strategy 2020-23</b>	2
<b>Staying Safe Policy</b>	3
Introduction	3
What does the policy cover? <ul style="list-style-type: none"> <li>• Safeguarding</li> <li>• Prevent</li> <li>• Health and Safety</li> <li>• Appropriate Adult Policy</li> <li>• General Data Protection Regulations</li> <li>• Useful information and links</li> </ul>	4
How is the policy actioned and monitored?	5
What to do if you feel the policy has been breached?	5
<b>The detail</b>	6
1. The underpinning statutory duties	6
2. Types of abuse included in the Safeguarding duties?	7
3. Emotional Health and Wellbeing	10
4. The Prevent Duty	10
5. Learning online safely	11
6. Health and Safety	11
7. Appropriate Adult Policy	11
8. General Data Protection Regulations	12
9. Useful information and links	12
<b>Appendices</b>	
Appendix 1: HACL Wellbeing Questionnaire Learner Information	
Appendix 2: Health and Safety: the detail	
Appendix 3: Golden Rules for Protecting Personal and Sensitive Data	
Appendix 4: ICT Acceptable Usage Policy	
Appendix 5: HACL Privacy Policy	
Appendix 6 HACL Guidelines for safe online learning	

# Staying Safe Strategy

HACL prioritises the safety, health and wellbeing of its staff, learners, volunteers and visitors above everything else and aims to create a culture where people feel safe to disclose their concerns. For this reason, we have combined the key elements to ensure these groups are and remain safe into one Staying Safe policy.

These key elements will change and grow over time and currently include:

- Safeguarding
- Prevent
- Emotional Health and Wellbeing
- Online safety
- Health and Safety
- General Data Protection Regulations

One approach will govern the actions that all users are expected to take to address any breaches: disclose any issues immediately they are identified to a Designated Safeguarding Officer, regardless of the nature of the disclosure. The process originally set up to deal with safeguarding disclosures has proven to be effective in enabling Designated Safeguarding Officers to address those disclosures swiftly and effectively.

All senior leadership team members will be identified throughout the service as Designated Safeguarding Officers and will be responsible for responding to all disclosures and maintaining accurate records. These DSOs will be members of the Staying Safe Board, along with other members from across the service responsible for those key elements.

Meeting termly, the Staying Safe Board will monitor the efficacy of disclosure management, identify any learning and plot the way forward. Members will scrutinise all elements of the policy and take responsibility for the action plan, ensuring effective staff training and communication with learners to maximise the efficiency of the actions taken.

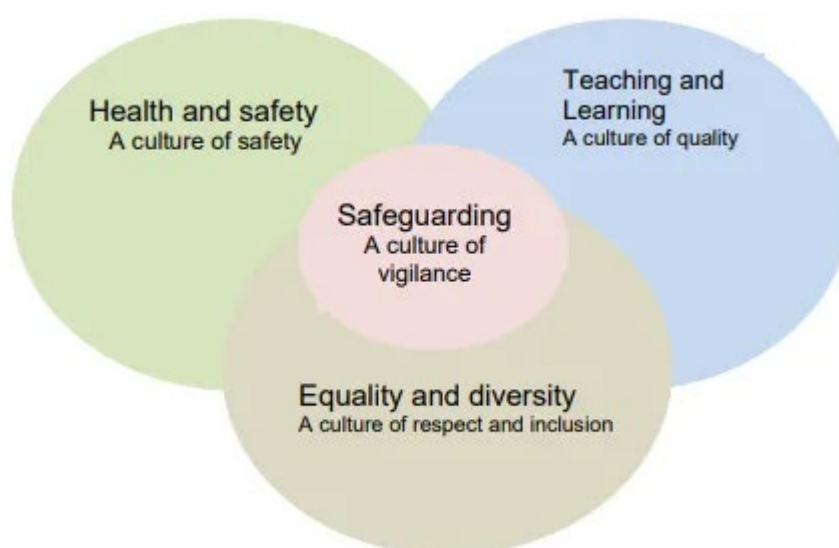
The key measures we use to achieve this are:

- Embedding the principles of safeguarding and all elements of the Staying Safe Strategy into management expectations, inductions and professional practice.
- Consistent enforcement of safer recruitment practices
- Rigorous DBS checking procedures and monitoring of the Central Register
- Clear communication and awareness raising with all users about the nature of abuse and how best to protect themselves and their loved ones from abuse.
- A comprehensive and ongoing programme of training and CPD for all service employees, rotating the topics to build and embed an understanding of a wide range of issues across the service
- Risk Assessment in place for staff and learners' where appropriate
- Monitoring of safeguarding incident reports and actions taken
- Safeguards to ensure the process works, including the ability of Staying Safe Board members to challenge Designated Safeguarding Officers and to escalate concerns direct to the Local Authority.

# Staying Safe Policy

## Introduction

Hillingdon Adult and Community Learning is fully committed to creating and maintaining a safe and secure environment for all users (learners, staff, visitors) and to ensuring that the needs of each individual are at the centre of everything we do. We will strive to ensure that all learners and staff work and learn in a safe and supportive environment.



To this end, the Staying Safe Policy incorporates the following priorities and responsibilities.

- € Safeguarding
- € Prevent
- € Health and Safety
- € Upholding the council's General Data Protection Regulations and standards

The underpinning statutory duties are outlined in Appendix 1. A summary of each element of these priorities is included in further appendices attached to this document (please see Section 2).

All service staff and users are expected to uphold these principles and act accordingly. Any breaches or concerns should be disclosed to the Designated Safeguarding Officers immediately for action. *Please note, we cannot guarantee confidentiality if we think there is a risk of someone coming to harm.*

## What does the policy cover?

**Safeguarding** includes:

- County lines
- Cuckooing
- Discrimination
- Domestic abuse, including coercive control
- Female Genital Mutilation
- Financial abuse
- Forced Marriage
- Institutional abuse
- Mate Hate crime
- Modern Slavery
- Neglect
- Online abuse
- Physical abuse
- Sexual abuse

### **Appropriate Adult Policy**

Guidance on appropriate enrolment procedures for adults with learning difficulties and disabilities.

**Preventing Violent Extremism** includes:

- Following Prevent Duty guidance in line with LA policies
- Action Counter Terrorism (ACT)

### **IT and Internet Usage Policy**

Contains IT and Internet usage policy, cyber security/online abuse, online safety guidelines, Loan and Learn Agreement, social media use, use of hae emails for learners,

**Health and Safety** includes:

- E-safety, digital learning and cyber security
- Maintaining health and safety standards in the service, for example through Covid-19 protocols, risk assessments including COSHH, visitors' protocols and evacuation and lockdown drills, including fire drills

### **General Data Protection Regulations (GDPR)**

Upholding GDPR policies and processes in line with LA standards and guidance

## How is the policy actioned and monitored?

All staff are expected to:

### ***Recognise, Respond, Report, Record and Refer***

*It is the responsibility of all staff and learners to **RECOGNISE** and **RESPOND, REPORT** and **RECORD** all disclosures confidentially and immediately to the Safeguarding Officer or Deputy, and the Safeguarding Officer or Deputy will **REFER** appropriately, whether of safeguarding, preventing violent extremism or any other area within the policy (outlined above).*

There are six principles of safeguarding:-

- Empowerment – making their own decisions and informed consent
- Prevention - taking action before harm occurs
- Proportionality – the least intrusive response appropriate to the risk presented
- Protection - support and representation for those in greatest need
- Parentship - local solutions through services working with their communities
- Accountability – accountable and transparency in safeguarding practice

**Designated Safeguarding Officers** (DSO) are drawn from the Senior Leadership Team, whose names and contact details can be found in centres and online in the Staying Safe section of Moodle. These officers are responsible for providing swift and sensitive responses to all disclosures under the Staying Safe Policy, for liaison with other agencies where appropriate and for the accurate maintenance of records. They will act in accordance with best practice when disclosures are made and these actions are subject to scrutiny of the Staying Safe Board and Local Authority governance structures.

**Staying Safe Board** (SSB) is comprised of relevant HACL staff who meet termly to monitor the effectiveness of the Staying Safe Policy and the actions taken in its name. This includes regular reviews of disclosures, responsibility for the safe recruitment and training of staff, and management of an accurate and updated Central Record. The SSB reviews each element of the policy annually to ensure that best practice is implemented at all times. If necessary, SSB members can refer their concerns through the Local Authority governance structures for additional actions.

**Local Authority governance strategies** (LA) underpin every element of this policy, including but not limited to access to the LA's Designated Safeguarding Officer.

## **What to do if you feel the policy has been breached?**

Report your concerns to a member of the management team or a Designated Safeguarding Officer for further investigation.

## **The Detail**

### **1. The underpinning statutory duties**

The service has statutory responsibilities to ensure that all learners and staff are protected under health and safety legislation and practice. It also has statutory responsibilities in relation to safeguarding under the following legislation and statutory guidance:

- Children Acts 1989 and 2004
- Children and Families Act 2014
- Education Act 2002 and 2011
- Safeguarding Vulnerable Groups Act (2006)
- Keeping Children Safe in Education 2015 and 2020
- Working Together to Safeguard Children 2015 and 2018
- What to do if You are Worried a Child is being Abused (2015)
- Care Act 2014
- Counter-Terrorism and Border Security Act 2019
- Modern Slavery Act 2015
- Forced marriage Act 2007 and the The Anti-social Behaviour, Crime and Policing Act 2014
- FGM Act (2003) including the mandatory reporting duty added in 2015

We recognise that extremism and exposure to extremist materials (radicalisation) and influences is a national priority and so should be addressed as a safeguarding concern. We also recognise that if we fail to challenge extremist views we are failing to protect our learners and fail in our obligation to promote a safe, equal and diverse society.

The service will emphasise the importance of prevention in all its actions.

### **Definitions**

The Children Act 2004 places a legal duty on the service to safeguard and promote the welfare of children. The Education Act 2002 and 2011 requires FE colleges to make arrangements to ensure that their functions are carried out with a view to safeguarding and promoting the welfare of children. The statutory responsibilities for safeguarding and promoting the welfare of children in FE colleges only apply in relation to learners who are under 18 years old. For adults aged 18 years and over, the term 'vulnerable adult' is no longer in use and has been amended under Protection of Freedoms Act (2012). In general terms, an adult (a person aged 18 or over) is classed as vulnerable when they are receiving community care services by reason of mental or other disability, age or illness and may also lack 'capacity'. Who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

## 2. Types of abuse included in the Safeguarding duties

The following list is not exhaustive. The Safeguarding duties covered under this policy are reactive to newly defined threats and incoming legislation. The definitions of abuse below are recognised in “Care and Support Statutory Guidance” issued under the Care Act 2014 and “Keeping Children Safe in Education” statutory guidance for schools and colleges:

**Discriminatory abuse** including bullying and harassment based on an individual’s age, sex, disability, religion, race or ethnicity, or sexual orientation.

**How we can support you:-** *The service rejects all forms of discrimination. If you feel you are being discriminated against please contact a member of staff or the DSOs directly.*

**Domestic abuse** – including psychological, physical, sexual, financial, emotional abuse; so called ‘honour’ based violence.

**How we can support you:-** *The service provides a safe space to ensure that victims are effectively supported as quickly as possible. All staff are trained in recognising abuse and reporting it swiftly and effectively. If you are aware of domestic abuse either directly or involving someone else against please contact a member of staff or the DSOs directly. Alternatively please visit the Domestic Abuse pages on the council’s website, where a wide range of information and support can be accessed.*

**Female Genital Mutilation (including breast ironing/flattening)** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs including using heated objects to stop breasts growing and developing, for nonmedical reasons. It has no health benefits and harms girls and women in many ways. It involves removing and damaging healthy and normal female genital tissue, and hence interferes with the natural function of girls’ and women’s bodies. The practice causes severe pain and has several immediate and long-term health consequences, including difficulties in childbirth also causing dangers to the child.

**How we can support you:-** *Staff have a statutory obligation to report FGM where it is known to them and are trained to identify potential FGM abuse. If you, or someone you know, are planning to enable FGM to occur, please report it to a member of staff or contact a DSO as a matter of urgency.*

**Financial or material abuse** including theft, fraud, internet scamming, coercion in relation to an adult’s financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

**How we can support you:** *Financial abusers are not all strangers; sometimes victims of financial abuse are coercively controlled and groomed and are unaware of the abuse taking place. If you are concerned about financial abuse in your own life, or are concerned for someone you know, please contact a member of staff or a DSO so that the victim can be supported.*

**Forced marriage** including but not limited to arranging the marriage of, or marrying, someone under the age of consent; taking someone overseas to force them to marry; marrying someone who lacks the mental capacity to consent to marriage; and/or being forced to sponsor someone through a UK visa.

**How we can support you:-** *Forced marriage is illegal in England and If you are concerned about yourself or someone you know, please contact a member of staff or DSO so that we can put appropriate support in place.*

**Institutional abuse** including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation

**How we can support you:-** *please speak to a member of staff or DSO in confidence so that the victim can be supported.*

**Mate Hate Crime** - is 'any criminal offence that is motivated by hostility or prejudice based upon a person's disability' and is carried out by someone known to the disabled person.

**How we can support you:-** *real friends do not behave in this way, so if someone is hurting you, stealing from you or makes you do something you don't want to do, speak to a member of staff or the DSO in confidence so that we can provide you with support.*

**Modern slavery** – encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

**How we can support you:-** *Modern slavery can be hard to identify. If you are a victim or you are concerned about someone else, please speak to a DSO in confidence so that we can provide as much support as possible.*

**Neglect** including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Self-neglect – this covers a wide range of behaviour such as neglecting to care for one's own personal hygiene, health or surroundings and includes behaviour such as hoarding.

**How we can support you:-** *Neglect can have significant effects on a victim's emotional health and wellbeing in addition to any other neglect that may be taking place. If you are suffering neglect, or are aware of someone who may be, please contact us immediately so that we can support the victim as much as possible.*



**Online (Digital) abuse** – includes online bullying or harassment, online hate crime, image-based abuse, online fraud and online grooming. The online world changes quickly and new risks are constantly appearing. It is important that staff and students have the skills to recognise risks and keep themselves safe.

**How we can support you:-** *This is included in the service induction process and guidance documents for learning online safely are available to all users. If you are a victim of online abuse please speak to a DSO or to the police.*

**Physical abuse** including hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child/adult.

**How we can support you:-** *Physical abuse is never acceptable. If you, or someone you know, is suffering physical abuse it is important that you report this as soon as possible. Please contact a member of staff or a DSO or call the police directly on 999.*

**Psychological/emotional** including emotional abuse, threats of harm and abandonment, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation. It may involve serious bullying (including cyberbullying), causing a person to frequently feel frightened or threatened. Some level of emotional abuse is involved in all types of maltreatment, but it can occur alone.

**How we can support you:-** *This type of abuse can have long lasting effects on the victim's mental health and cannot be tolerated. If you are suffering abuse, or are aware of someone else who is suffering, please tell a member of staff or a DSO as soon as possible so that we can provide support to the victim.*

**Sexual abuse** including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, up, sexual photography, upskirting, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

**How we can support you:-** *Sexual abuse is a crime. If you, or someone you know, has suffered sexual abuse, please contact a member of staff or a Designated Safeguarding Officer as soon as possible. Alternatively, please contact the police or your GP so that support can be provided as quickly as possible.*

**Sexual Violence and Sexual Harassment Between Children in Schools and Colleges** includes rape, inappropriate touching, sexual comments (including telling sexual stories) lewd comments, sexual remarks about clothes or appearance or sexualised names. This can be in person or online. It also includes exploitation, coercion and threats.

**How we can support you:-** *this behaviour is not acceptable and not tolerated. Although the situation can be complex this is a crime and victims are often confused and unsure if they have been a victim of a crime. Therefore, if you or someone you know has suffered sexual violence or sexual harassment, please contact a member of staff or the Designated Safeguarding Officer as soon as possible. Alternatively, please contact the police or your GP so that support can be provided as quickly as possible.*

### 3. Emotional Health and Wellbeing

Emotional health and wellbeing is important to us and could be a safeguarding issue if an individual is at risk of harming themselves or others or neglecting their physical health. In order to ascertain the level of risk that a learner may be experiencing, we use the NHS Single Point of Access referral process to guide us. The level of risk is assessed by this process and will determine whether we ask for your permission to pass your information to other agencies such as the Central North West London NHS Foundation Trust. If we feel that you are at risk of harming yourself or others, consent will not be needed as we will always act to ensure everyone's safety.

*All learners are encouraged to complete the HACL wellbeing questionnaire, if learners wish to take an EHW course, completion of this questionnaire is mandatory.*

***How we can support you?*** *If you are concerned about the safety of your own mental health or of someone else's, please report this to the Designated Safeguarding Officer as soon as possible.*

**[Appendix 1: HACL Wellbeing Questionnaire Learner Information](#)**

### 4. The 'Prevent' Duty

The Prevent strategy, published initially by the Government in 2011 and reviewed within the

Counter-Terrorism and Border Security Act 2019, is part of the overall counter-terrorism strategy, CONTEST. It includes all forms of violent, non-violent and digital terrorism, extremism and radicalisation. Its aim is to reduce the threat to the UK from terrorism by stopping people from being drawn into terrorism.

It is important that every member of the community is aware of this threat and vigilant about identifying and reporting situations that could potentially lead to radicalisation. Early signs of radicalisation often include changes in mood and behaviour and attempts by the person involved to isolate themselves from family, friends and their everyday life. Hillingdon Council takes a safeguarding approach to its Prevent strategy and utilises supportive measures to work with the person concerned in order to minimise the influence of those who would attempt to radicalise him/her.

***How can we support you?*** *All HACL staff are trained to report any Prevent disclosure using the 5Rs approach, which will then be actioned by a DSO. If you have concerns about yourself or someone else, please tell a member of staff or talk to the DSO so that we can provide the support as swiftly as possible.*

*To find out more we have a free video called 'ACT Early' is available to everyone. This explains key Prevent messages, provides ideas about how to spot the signs, the support that is available and includes some real stories of people they have helped. You can access **this on our Moodle site or by clicking on this [link](#)**. Please feel free to watch this if you would like to do so.*

## 5. Online Safety

As online learning increases staff and Learners are encouraged to stay safe while using a variety of websites and online platforms to access and continue with their learning and are therefore expected to follow the *HACL Guidelines for safe online learning* and the *Acceptable ICT and internet usage policy*.

Please see Appendix 4 [Acceptable ICT and internet usage policy](#) in detail

Please see Appendix 6 [HACL Guidelines for safe online learning](#) in detail

## 6. Health and Safety

***This provides the overall aims and responsibilities of health and safety management for Hillingdon Adult and Community Learning.***

Every staff member has an individual responsibility to ensure that health and safety standards are maintained. That said, named members of the management team are charged with additional responsibilities.

Learners have a duty to act in a way that ensures that they can study in a healthy and safe environment that does not threaten their own, or others'. Tutors must inform learners of this responsibility and ensure that learners sign the H & S in their Individual Learning Plans (*ILP*). Learners and tutors should report any concerns that they may have to either centre staff, curriculum staff or the Designated Safeguarding Officers.

Please see Appendix 2 for the Health and Safety Policy in detail

## 7. Appropriate Adult Policy

***Advice and guidance for staff about the enrolment of residents with learning difficulties and/or disabilities***

It is very important to ensure that the person's decision to enrol is truly their own. Hillingdon Adult Learning and people close to the person have a role to play in discussing the options, and we will seek to ensure that learners feel they are making informed decisions they are happy with.

Even where information is presented as simply and clearly as possible some people will not be capable of taking some decisions, or indeed of signaling their agreement. This is most likely to apply to some people with severe learning disabilities. However, all practicable steps must be taken to help the person make their own decision.

HACL staff will do their utmost to give advice and guidance to help find the best course for each learner. If a person is not capable of making or confirming a decision to enrol but it is deemed in their best interests, then Hillingdon Adult and Community Learning agrees that a parent or designated carer/support worker can sign the enrolment form on their behalf.

**Please note, HACL staff are not permitted to take on this role.**

## 8. General Data Protection Regulations (GDPR)

The council has a duty to protect the information held about members of the public. As a publicly-funded organisation, HACL has an obligation to collect personal and sensitive information about learners, for example data that provides evidence against funding rules, and to share this with key stakeholders.

HACL has policies and processes in place to safeguard the data it collects which are based on, and approved by, the Local Authority. HACL staff are expected to comply with these protocols and undergo regular training to ensure they can do so. Any breaches will be reported to senior management as a matter of urgency so that appropriate action can be taken.

Appendix 3: [Golden rules for protecting personal and sensitive data \(hillington.gov.uk\)](#)

Appendix 4: [ICT Acceptable Usage Policy \[98KB\] \(hillington.gov.uk\)](#)

Appendix 5: [HACL Privacy Policy](#)

## 9. Useful information and links

[LBH domestic abuse information page](#)

[exam support service \(www.gov.uk\)](#) DfE advice about managing this process

### Support for staff

A [protocol for teachers delivering live lessons online \(aoc-services.co.uk\)](#) and engaging in one to one activity with under 18s, developed by Kirklees College and the National Association for Managers of Student Services (NAMSS)

For teachers lacking confidence or skills in using the internet and devices, ETF's [essential digital skills professional development programme \(etfoundation.co.uk\)](#) can help teachers develop their digital skills. The online learning modules include topics on:

- € using devices
- € handling information
- € staying safe online

[Holex](#): the national network for ACL providers

### Support for children and young people

[SafeCall \(missingpeople.org.uk\)](#) which offers support to victims of exploitation – young people can contact SafeCall directly or can be referred to SafeCall by professionals

[See, Hear, Respond service \(barnardos.org.uk\)](#) provided by Barnardo's to help young people in England who are experiencing harm and increased adversity during lockdown

## **Support with Mental Health issues**

[MindEd](#) which includes e-learning modules about young people's mental health  
[Every Mind Matters | One You \(www.nhs.uk\)](#) which has specific advice for adults and young people on maintaining good mental wellbeing during the coronavirus (COVID-19) pandemic  
[COVID-19 Resources | Association of Colleges \(aoc.co.uk\)](#) which includes advice for students and staff

Education Support's [mental health and wellbeing support services for all education staff \(educationsupport.org.uk\)](#)

[NHS App Store \(www.nhs.uk\)](#) for mental health and wellbeing support

[Digital Wellbeing of Students guide \(jisc.ac.uk\)](#) from Jisc, which curates a number of resources and guides

[Samaritans' website](#) which provides guidance on how to prepare for and respond to a suspected suicide in FE colleges

## **Online safety links**

Content linked to terrorism can be reported to <https://www.gov.uk/report-terrorism>

You can anonymously and confidentially report child sexual abuse content, criminally obscene adult content and non-photographic child sexual abuse images via <https://www.iwf.org.uk/>

If someone has been a victim of revenge pornography, this helpline can provide advice and get images removed <https://revengepornhelpline.org.uk/>

Reporting indecent or offensive content on Twitter

<https://support.twitter.com/articles/15789>

Reporting indecent or offensive content on YouTube

<https://www.youtube.com/intl/en-GB/yt/about/policies/#reporting-and-enforcement>

Reporting indecent or offensive content on Facebook

<https://www.facebook.com/help/contact/274459462613911>

Reporting indecent or offensive content on Instagram

<https://help.instagram.com/519598734752872>

Hate crime including online content can be reported via [www.report-it.org.uk](http://www.report-it.org.uk)

Harmful or upsetting content can be reported to <https://reportharmfulcontent.com>

If you have been the victim of fraud contact <https://www.cifas.org.uk>

or if you wish to report any form of cybercrime contact [www.actionfraud.police.uk/](http://www.actionfraud.police.uk/)