



**Management Training and Development Limited**  
(t/a MTD Training)

## **Apprenticeship Safeguarding & Prevent Duty Policy**

<b>Policy Owner</b>		<b>Position</b>		
Sean McPheat		Chief Executive Officer		
<b>Review History</b>				
V1	Approved	January 2021	Review	March 2022
V2	<ul style="list-style-type: none"> <li>• Addition of more detail of how the policy is promoted to apprentices, staff and employers. (page 3)</li> <li>• Addition of detail in Safe Recruitment and Training OF Staff (page 4)</li> <li>• Addition of more detail re. "5Rs" (page 10)</li> <li>• Addition of extra detail of types of abuse. (page 5-8)</li> <li>• Addition of detail in making /responding to a disclosure. (Page 8-9)</li> <li>• Addition of support available to apprentices (Page 11)</li> <li>• Addition of monitoring of IT usage. (Page)</li> <li>• Addition of detail in action that MTD will take to protect apprentices from radicalisation. (Page 17)</li> </ul>	March 2022	Review	March 2023
V3	<ul style="list-style-type: none"> <li>• Update applicable safeguarding and prevent legislation references. (P3)</li> </ul>	June 2023		September 2023
V4	<ul style="list-style-type: none"> <li>• Updated to reference adherence to Keeping Children safe in Education 2023</li> </ul>	September 2023		September 2024

## Policy Statement

Management Training & Development Limited (MTD) are fully committed to safeguarding the welfare of our learners.

The development and implementation of this policy and procedures are an integral part of MTD's determination to provide high-quality responsive services, which meet the needs of our customers and service users.

All staff, associates and volunteers have a responsibility to take appropriate steps to protect our learners at risk and to understand their responsibility to operate within this policy. Good safeguarding includes arrangements for prevention as well as responding to allegations of harm and abuse. Harm and abuse may include physical, sexual, psychological, financial and institutional abuse, acts of neglect and omission and discrimination. All allegations concerns or suspicions of abuse or neglect are taken seriously by MTD and responded to in line with our procedures and within the reporting structures of the local authority in which we work.

Allegations made against members of staff will be dealt with. MTD handle all disclosures in accordance with the requirements of a national framework of standards and good practice and outcomes in Adult protection (ADASS 2006). This policy states our approach to preventing and responding to safeguarding issues.

## Introduction

MTD fully recognises its statutory and moral duty to promote the safety and welfare of those learners who are under the age of 18 years and those adult learners who are deemed to be vulnerable; however; MTD has a moral duty and is committed to the safeguarding of all learners regardless of their age and vulnerability.

This policy has been developed in accordance with the principles established by the:

- The Department for Education's (DfE) 'Keeping children safe in education' (September 2023)
- The statutory guidance 'Working together to safeguard children', (HM Government July 2018 updated Dec 2020) Working Together to Safeguard Children 2018 ([publishing.service.gov.uk](https://publishing.service.gov.uk))
- Children Acts 1989 and 2004;
- the Education Act 2011, and in line with the government publication:
- Safeguarding Children Board (LSCB) procedures.
- 'Prevent duty guidance: for Further education institutions in England and Wales: (HM Government 2015 – Updated April 2021) Prevent duty guidance - GOV.UK ([www.gov.uk](https://www.gov.uk))
- Further Education and Skills Inspection handbook (Published 14th May 2019, last updated 11th July 2022) Further education and skills handbook - GOV.UK ([www.gov.uk](https://www.gov.uk))

All staff should ensure that they have read and understood the associated policies listed on page 4, to support the effective implementation of the safeguarding policy and procedures.

## Scope

MTD'S Chief Executive Officer hold overall responsibility for this policy and its procedures will apply to:

- The Senior Leadership Team
- Employees of MTD
- Learners / apprentices
- Contractors
- Employers providing an apprenticeship

- All other users of MTD
- All MTD activities

The Policy and Procedures will apply at all times when MTD is providing services or activities that come under the responsibility of the organisation.

## Definitions

Although legislation is specifically related to children and vulnerable adults as defined below, MTD is committed to the safeguarding of all learners and the term learner is used throughout this policy.

Child - In terms of this policy, a child is defined as anyone who has not reached their 18th birthday.

Vulnerable Adults - In terms of this policy, a vulnerable adult is defined as a person aged 18 years or over and who is or may be in need of community care services by reason of mental or other disability, age or illness and 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. This may include a person who has a learning difficulty, a physical or sensory disability or a mental illness.

Definition of Safeguarding: Safeguarding and promoting the welfare of learners is defined in 'Working Together to Safeguard Children (2018)' 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
- Taking action to enable all children to have the best outcomes

Note: Learners with additional needs and/or disabilities can face further safeguarding challenges. It is essential that these learners are given the support and guidance to remove barriers.

## Communicating & Promoting The Policy

MTD recognises that safeguarding and promoting the welfare of its learners is everyone's responsibility. Everyone who comes into contact with an apprentices and their families, carers and employers has a role to play in safeguarding. The safeguarding policy is shared with all staff, apprentices and employers on an annual basis and as and when any in-year updates are made aligned to legislation changes.

Ongoing promotion of the policy takes place at every meeting with an apprentice and employer including, initial IAG sessions, enrolment, learning sessions, progress reviews. Any concerns are reported immediately to MTDs designated Safeguarding lead.

The policy, its purpose and reporting procedures will be reinforced via team and employer meetings, is embedded within the learners and employer handbook, during one-to-one learning sessions, during group Masterclass delivery, through staff training, learning resources and literature. Where practicable, safeguarding and prevent principles are embedded into curriculum topics.

Additional support and guidance will be provided to ensure that any learner with a learning difficulty or language barrier can access the policy, its aims and supporting literature.

Staff promotion and adherence to the policy is monitored throughout delivery, for example, during Observations of Teaching Learning and Assessment (OTLA) with findings reported to MTD leadership team.

All staff have read and confirmed their understanding of the Keeping Children Safe in Education 2021

## Safer Recruitment & Training For Staff

When recruiting new members of staff, MTD follows the government guidance “Safeguarding Children: Safer Recruitment in Education” and Safer Recruitment principles and pays due regard to the Safeguarding Vulnerable Groups Act 2006 and the Protection of Freedoms Act 2012.

MTD adapts the guidelines within the Baseline Security Standard (BPSS) for all appointments and ensures that the relevant staff member uses the DBS checking service to assess applicants’ sustainability for positions of trust. The company also compiles fully with the Code of Practice and aims to treat all applicants for positions fairly. DBS checks are undertaken in line with government guidance and current legislation, alongside appropriate references being obtained and ensuring qualifications are verified. Safer Recruitment training has been undertaken by senior members of staff who conduct recruitment activities in accordance with statutory guidance.

Newly appointed staff will have a job role induction (JRI) in line with our probation policy over a 6-month period. We ensure that all employees are made aware of the standards expected of them and appropriate support, training and feedback is provided to achieve these standards. Employees will be made aware of the relevant Safeguarding and Prevent procedures as part of that induction program and will be given a copy of our Safeguarding Policy. Safeguarding training and awareness will form part of all staff members regular CPD activity (At least once every 6 months)

## Recognition of Abuse, including Neglect, Bullying and Cyber Bullying

Recognition of Abuse, including Neglect, Bullying and Cyber Bullying Recognising abuse is not easy, and it is not the responsibility of staff, volunteers or learners to decide whether abuse has taken place or if there is significant risk. We do however have a responsibility to act if we think it may be happening. Abuse, including neglect, includes forms of maltreatment of a learner. Somebody may abuse a learner by inflicting harm, by failing to act to prevent harm. Learners may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger for example via the internet. They may also be abused by a learner or learners, or by another learner.

MTD staff will remain vigilant for early signs of the below types of abuse with intent to prevent –

**Abuse** - may be physical, sexual or emotional abuse, or neglect.

**Significant harm** - ill treatment or the impairment of health or development (compared with the health or development which might be expected of a similar learner)

**Physical abuse** - actual or likely physical injury to a learner, or failure to prevent injury. This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm. Physical harm may also be caused when a parent or carer feigns symptoms of, or deliberately causes, ill health to a learner they are looking after. This form of physical harm is recognised as Fabricated or Induced Illness.

**Sexual abuse** - actual or likely sexual exploitation of a learner, including prostitution. Involving forcing or enticing a learner to take part in sexual activities without their consent or understanding, this may not necessarily involve violence. The activities may involve physical contact including penetration or non- penetrative acts. For example, it may also include involving the learner looking at or being involved in the production of, pornographic material or watching sexual activities, or encouraging the victim to behave in sexually inappropriate ways. Can include grooming a vulnerable learner in preparation for abuse.

**Emotional abuse** - emotional abuse is the persistent emotional ill treatment of a learner with the intent to cause severe and persistent adverse effects on the victim’s emotional development. It may involve conveying to the victim that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Age or developmentally inappropriate expectations being imposed on a learner, causing them frequently to feel frightened, or the exploitation or corruption of learners will also constitute emotional abuse. This may also include overprotection and limitation of exploration and learning or participating in normal social interaction. It can include seeing or hearing ill treatment of another person. It may include serious bullying, including cyber-bullying. It may include not giving the

learner opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate.

**Neglect** - neglect is the persistent failure to meet a vulnerable learner's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development such as failing to provide adequate food, shelter and clothing, medical care or treatment or neglect of, or unresponsiveness to, their basic emotional/physical needs. It can include not protecting a vulnerable learner from emotional harm or danger.

**Peer-on-peer abuse** – Peer-on-peer abuse is behaviour by an individual or group of individuals which can be a one-off incident or repeated over time. It is behaviour that intentionally hurts another individual or group either physically or emotionally. Peer on Peer abuse is often motivated by prejudice against particular groups steered by a dislike for a person's race, religion, gender, sexual orientation, special educational needs or disabilities; or where a person is adopted or in care, has caring responsibilities, is suffering from a health problem, is frequently on the move (e.g. those from military families or the travelling community), is experiencing a personal or family crisis, has actual or perceived differences, (e.g. physical or cultural differences) It can take many forms including serious bullying (including cyberbullying, prejudice based bullying or discriminatory bullying), up-skirting, relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, financial abuse, harmful sexual behaviour and/or gender-based violence.

**Risks/ abuse related to family/cultural belief/ faith** - It is important to remember that many learners are a part of a family. Some families have certain values and beliefs that can cause harm to a learner. An example of this can include strong beliefs or a sense of honour or shame that can prevent people from seeking or accepting the help they need. A strong cultural or religious belief in the sanctity of marriage may dissuade people from leaving their partners, even if they are violent. In addition, many religions and cultures have strong beliefs around sex outside marriage, making it very hard for young, unmarried, pregnant women to get the help they need. Differences in culture or religion between partners, or between parents and children, may also make it more difficult for individuals to understand and support each other. Where one partner perceives their faith and heritage to be superior to, or more important than, their partner's it can lead to a power imbalance and an erosion of the other partner's self-esteem. In extreme cases the person who are perceived as "disobedient" or "different" are believed to be possessed by a spirit controlling their behaviour. The person can be physically and emotionally abused to exorcise the spirit.

**Bullying and Harassment** - Bullying can include a variety of behaviours from one individual/ group to another individual/ group such as name calling, offensive language, coercion, hitting, pushing, theft or damage to belongings, cyber, spreading harmful messages, hate crime or mate crime which is befriending someone with the intent to exploit them in some way. Please refer to Babington's Anti-Bullying Policy for further detail.

**Cyber Bullying and E-Safety** - The safe and responsible use of technology is sometimes presented as primarily a learner protection issue, but all need support to keep themselves safe online. The risks associated with the use of technology are vast and include internet, text or video messaging, email, chatrooms, social media networking sites, etc. used to embarrass, humiliate, threaten, intimidate, or bully an individual in an attempt to gain power and control over them. Other risks include the mismanagement of personal data, risks of financial scams, identity theft, grooming and radicalisation.

**Domestic Violence** - can be physical, emotional, sexual, neglect. This category also covers Forced Marriages and honour-based violence. Some learners may experience issues with drugs or alcohol to self-medicate or via dependence.

**Female Genital Mutilation (FGM)** - Victims of FGM are likely to come from a community that is known to practice FGM. Professionals should note that females at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires staff to report where, during their professional duties, they either are informed by a female under 18 that an act of FGM has been carried out on her, observe physical signs which appear to show that an act of FGM has been carried out on a female under 18 and they have no reason to believe that the act was necessary for the female's physical or mental health or for purpose with labour or birth. For the purposes of the duty, the relevant age is the female's age at the time

of disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses, she had FGM when she was under 18).

**Forced Marriage** - One or both spouses do not consent to the marriage or consent is extracted under duress. Duress includes both physical and emotional pressure. When a person does not consent or is unable to assent, there is a lack of full and free consent (if they have learning disabilities or a mental health need, for example). A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in choosing the marriage partner but the choice whether to accept the arrangement remains with the person.

**Incels** - Incels or Involuntary celibates, are heterosexual men who are being radicalised online and blame women and society for their own inability to form romantic or sexual attachments. Incels are the most violent element of the manosphere, with rape, violence and even murder justified to draw attention to the “problem” of sexually frustrated young white males. It shares some similarities with the better-known alt-right movement, with both groups attributing society’s ills to social liberalism, women and ethnic minorities. Acid attacks are a popular suggestion for retribution since they usually result in physical disfigurement and the sexual enslavement of women is also advocated to ensure “fair” distribution of sex.

**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.

**Risk to self and/or others** - This may include but is not exclusive to self-harm, suicidal tendencies or potential risk of harming others, which may or may not include learners. This may be because of an individual experiencing a significant level of personal, emotional trauma and/or stress.

**Serious Crime** - Serious and organised crime includes drug trafficking, human trafficking, organised illegal immigration, child sexual exploitation, high value fraud and other financial crime, counterfeiting, organised acquisitive crime and cyber-crime.

**Sexting** - This is when someone sends or receives a sexually explicit text, image or video. This includes sending ‘nude pics’ or ‘rude pics’ or ‘nude selfies’. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. Once the image is taken and sent, the sender has lost control of the image and the image could end up anywhere. By having in their possession or distributing to others indecent images of a person under 18, many people are not aware that they could be committing a criminal offence under the Sexual Offences Act 2003. Any direct disclosure by a learner (male or female) will be taken very seriously. A learner who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure is a last resort, and they may have already tried to resolve the issue themselves. When an incident involving sexting comes to our attention, we will follow the guidance as set out in the UKCCIS publication Sexting in Schools and Colleges: Responding to incidents and Safeguarding learners.

**Sexual violence and sexual harassment between learners** - Sexual violence and harassment can occur between two learners of any age or gender or when a group of learners sexually assaults or harasses a single learner or a group of learners. Sexual violence and sexual harassment may overlap and can occur on-line and off-line (both physical and verbal). Sexual violence includes offences under the Sexual Offences Act 2003 (rape, assault by penetration and sexual assault). Consent is defined as the ability to choose freely. Consent to sexual activity can be provided for one type of sexual activity but not for another, and it can be revoked at any time during the action and each time it takes place. Sexual harassment is unwelcome sexual behaviour that is likely to violate a learner’s dignity, intimidate, degrade, or humiliate them, and/or create a hostile, offensive, or sexualised environment. It can happen both online and offline. Sexual remarks, such as telling sexual stories; lewd remarks; sexual remarks about clothes and appearance; calling someone sexualised names; sexual "jokes" or taunting; deliberately brushing against someone; interfering with someone's clothes; or displaying pictures, photos, or drawings of a sexual nature are all examples. Sexual harassment on the internet can occur on its own or as part of a larger pattern of sexual harassment and/or sexual assault. Non-consensual sexual image and video sharing sexualised online bullying, unwelcome sexual comments, and messages

(including on social media), sexual exploitation, coercion, and threats, and up-skirting are all examples. If staff have a concern about a learner or a learner makes a report to them which relates to peer-on-peer sexual violence and/or sexual harassment, they must report their concerns to the safeguarding team immediately.

**Initiation/Hazing** - Hazing or initiation ceremonies refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group. Hazing is seen in many different types of social groups, including gangs, sports teams and educational groups. The initiation rites can range from relatively benign pranks, to protracted patterns of behaviour that rise to the level of abuse or criminal misconduct. Hazing may include physical or psychological abuse. It may also include nudity or sexual assault.

**Upskirting** - Upskirting is a highly intrusive practice, which typically involves someone taking a picture under another person's clothing without their knowledge, with the intention of viewing their genitals or buttocks (with or without underwear). It is now a specific criminal offence in England and Wales. It can take place in a range of places, e.g., British Transport Police have seen a rise of reports on public transport. The law captures instances where the purpose of the behaviour is to obtain sexual gratification or to cause humiliation, distress, or alarm. Perpetrators will now face two years in prison with the most serious offenders being placed on the sex offenders' register. Criminalising this distressing practice aims to deter people from committing the crime

Staff need to have an awareness of the different types of safeguarding issues and explanations and definitions (Appendix c).

MTD take their safeguarding responsibilities very seriously and as such will not tolerate any forms of abuse, bullying or harassment.

### **Looked After Children**

All staff need to be aware of issues around safeguarding looked after children. The most common reason for young people becoming looked after is as a result of abuse and/or neglect.

### **Learners With Special Educational Needs & Disabilities**

All staff need to be aware that additional barriers can exist when recognising abuse and neglect in learners with special educational needs (SEN) and disabilities. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability without further exploration.
- Learners with SEN and disabilities can be disproportionately impacted by issues such as bullying without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.
- Staff should refer to the learner's education, health care plan (HCP). This will provide additional guidance specific to the learner's support needs.
- MTD recognises that safeguarding is not just about protecting learners from deliberate harm, neglect and failure to act. It relates to the broader aspects of care and education and the following procedures should be read in conjunction with this policy:
  - Health and Safety Policy
  - Safer Recruitment Policy and Guidelines
  - Learner Behaviour Policy
  - External Speakers and Events Policy



## Procedure For Staff

### Disclosures

If a learner makes a disclosure to a member of staff, the learner should be acknowledged, taken seriously and listened to. The staff member who receives the allegation or disclosure should make an immediate written record of the conversation, including the following information:

- Date and time of report.
- Name of Individual.
- DOB of alleged.
- Nature of allegation.
- Any other information given, including siblings if relevant. (their full names and DOB if possible)
- Confirmation that the Learner / staff member has been advised of the next steps.

### During the disclosure

- As soon as it becomes clear that the learner is talking about a safeguarding issue, you need to gently stop them and inform them that you have a legal obligation to pass this information on to a Designated Safeguarding Lead. You cannot promise confidentiality to the learner. Reassure the learner but tell them that a record of information given will be made.
- It is important not to ask too many questions as you must not under any circumstances investigate any accusations.
- Allow the learner to freely recall significant events, keeping questions to the absolute minimum necessary to ensure a clear and accurate understanding of what has been said. Record the factual details of what has been told to you using the Safeguarding Disclosure Form. Concern / Disclosure Form (Appendix A). Contact the Designated Safeguarding Lead immediately to explain the situation and pass on the written notes. The Designated Safeguarding Lead will outline the action that he/she has to take so that you can explain this to the learner. It may be appropriate for the Designated Safeguarding Lead to meet the learner. You must not take any further action yourself. This includes contacting parents/carers or outside agencies. The DSL will be required to report a referral immediately to the local safeguarding authority.

Disclosure records are held by the Safeguarding Team/ HR Designated Safeguarding Officer and stored on a secure server. Staff must take care not to influence the outcome either through the way they speak to or question learners. MTD continues to welcome the learner whilst investigations are being made in relation to any alleged abuse. The learner may choose to withdraw from learning activities whilst investigations take place. We follow the procedures as set by the Safeguarding Children Partnership in relation to the delivery of services and designated roles and tasks in supporting the learner, family and employer throughout any investigation. All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the Safeguarding Children Partnership and Local Authority Designated Officer (LADO).

- Refer any concerns about a learner, to the Designated Safeguarding Lead, to agree a course of action. Options can include referral to specialist services or early help services.
- MTD recognises its role in identifying learners who may benefit from early help and providing support as soon as a problem emerges in a learner's life. Providing early help is more effective in promoting the welfare of young people than reacting later. Staff may be required to support other agencies and professionals in an early help assessment and share information support early identification and assessment. The DSL will be required to report a referral immediately to the local safeguarding authority.
- If early help is appropriate, the Safeguarding Lead will support the staff member to liaise with external agencies. The learner should then be monitored and if the situation does not appear to be improving, a referral will be made by the Designated Safeguarding Lead and to the Local Authority Designated Officer (LADO) or Local Safeguarding Board to ensure the learner's situation improves.

- Prevent related concerns should also be escalated to the designated safeguarding lead immediately who will refer to the regional Prevent Coordinator for advice and guidance.

### **If MTD staff believe a learner is in immediate danger or at risk of harm:**

This immediate concern must be reported to the Designated Safeguarding Lead and if a learner is in immediate danger or is at risk of harm, a referral will be made to the Local Authority Designated Officer (LADO), Safeguarding Board or to the police immediately.

### **The 5Rs**

**Recognise** - One of the most important roles for any employee is to be able to recognise abuse or neglect in the course of their everyday work. Sometimes, the signs are obvious such as broken bones or cuts and bruises. However, sometimes the signs are a lot less easy to identify.

**Respond** - All employees working with learners need to be alert to signs of abuse or neglect and know how to respond appropriately (including knowing who in their organisation to share their concerns with and where appropriate, knowing how to ask relevant non-leading questions to see if there is a reasonable and consistent explanation for the signs observed

**Recording** - When recording an incident, a Safeguarding Report Form must be completed (available on the p-drive) The document must be password protected and forwarded to the safeguarding team at [safeguarding@mtdtraining.com](mailto:safeguarding@mtdtraining.com) by close of business the same day. Please be aware that this must be completed before 5pm and at the earliest opportunity to allow the On-Duty DSO time to contact you for the password and make the relevant checks and address concerns appropriately in a timely manner. Whilst you can record observations, do not interpret, or give opinion as this may bias the information provided and jeopardise any future investigation into the allegation. The Safeguarding Report Form must be deleted from your pc and sent mailbox once you received confirmation from the On-Duty DSO, they have processed your concern.

**Report** - Any issues or concerns, allegations or suspicions relating to Safeguarding must be taken seriously and reported to an On-Duty Safeguarding Designated Lead/ HR Designated Safeguarding Officer.

**Refer** - Where required, the Safeguarding Representative will refer or support you with guidance on next steps and / or signposting to the relevant external agency.

### **If A Member Of Staff Receives Information About A Learner From Another Person**

If a member of staff receives information about a learner, which suggests that there is a safeguarding issue or that this is likely, this must be recorded on the Safeguarding Concern / Disclosure Form and reported immediately to the Designated Safeguarding Lead. MTD has a duty to refer these concerns to the Local Authority Children's Social Care Office for the area in which the learner lives or to the police if the learner is in immediate danger.

### **If A Member Of Staff Suspects A Learner Has A Safeguarding Concern**

If a member of staff suspects that a learner is at risk from a safeguarding issue, they must discuss these concerns with the Designated Safeguarding Lead and not take any independent action. The concerns must be recorded on the Safeguarding Concern / Disclosure form.

All contact with outside agencies over issues of safeguarding must be approved by the Designated Safeguarding Lead. The Designated Safeguarding Lead will decide whether to make a referral to children's social care, Local Safeguarding Board or Local Authority Designated Officer (LADO).

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect,

female genital mutilation or other so called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

Parents / carers have the right to be informed in respect of any concerns or any action taken to safeguard and promote their welfare, providing this does not compromise the learner's safety. Keeping Children Safe in Education (2018).

### Support Available For Our Apprentices

MTD staff will support apprentices, before during and after a disclosure and with any general safeguarding advice. Skills Coaches are in regular contact with apprentices and discuss any safeguarding issues at each learning session.

MTD have a dedicated safeguarding email address [safeguarding@mtdtraining.com](mailto:safeguarding@mtdtraining.com) and a dedicated phone number 02476991587 which is featured on all resources and in the Learner Handbook.

### External Support & Help Lines.

#### Anti-Bullying help lines and organisation help lines:

Childline Phone: 0800 1111

NSCPCC Phone: 0808 800 5000

Family Links Phone: 0808 800 2222

Respect Me – 0344 800 8600 (Scotland)

#### Organisations/ websites:

Anti-Bullying Alliance: <http://www.anti-bullyingalliance.org.uk/>

National Society for the Prevention of Cruelty to Children (NSPCC): <http://www.nspcc.org.uk/>

ChildLine: <http://www.childline.org.uk/Pages/Home.aspx>

Kidscape: <http://www.kidscape.org.uk/>

Family Lives: <http://familylives.org.uk/>

Respect Me: <https://respectme.org.uk/>

### Allegations Of Abuse Made Against Other Young People

Staff must recognise that young people are capable of abusing their peers and be aware that safeguarding issues can manifest themselves via peer on peer abuse. Peer on peer abuse is abuse young people may experience from their peers (people of their own or similar age) perpetrated by a young person/s (under the age of 18 years)/vulnerable adult/s on young person/s/vulnerable adult/s.

Staff need to be aware that abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. MTD will take any concerns of this nature very seriously and concerns should be raised in the same way as any other concerns, directly to their trainer or to the Safeguarding Team.

Peer on peer abuse can take the form of bullying (including cyber-bullying) sexting and any other form of sexual or physical abuse. Gender based issues can also occur for example girls being sexually touched/ assaulted or boys being subject to initiation/hazing type violence.

### Visitors

All official visitors to MTD premises are required to report to the main reception on arrival and sign in. Visitors are issued with a visitor pass on a MTD lanyard which must always be worn and visible. Visitors are asked to wait in reception until they are collected by a member of staff. Visitors are not permitted to enter access-controlled areas unless accompanied by a member of staff.

Guest Speakers will be subject to the guest speaker policy vetting procedure.

All centres must carry out appropriate checks on the material that is being presented prior to a guest speaker event. The relevant checks must be made against all guest speakers before any event is approved.

Guest speakers are not permitted to work alone with any learners and will always be accompanied by a trainer. The Guest Speaker approval form must be completed prior to the event and shared with the DSL.

### **Apprentices Work Settings**

MTD has a responsibility to ensure the health, safety and welfare of all learners undertaking apprenticeships with employers.

MTD will ensure that employers are aware of this policy and their responsibilities for compliance in relation to Safeguarding and the Prevent duty for any learner who is placed with them and that arrangements are in place to ensure that a learner's wellbeing is safeguarded.

### **Learners With Criminal Convictions**

MTD is committed to the fair treatment of all learners and welcomes applications from a wide range of individuals, including those with criminal convictions.

MTD is committed to the equality of opportunity and selects individuals based on their skills, qualifications and experience and not on their background or personal circumstances. Having a criminal conviction will not necessarily prevent someone from studying at MTD.

MTD is mindful, however, of the duty of care it owes to its learners, staff and the wider community to act reasonably to protect their health, safety and welfare. As a consequence, MTD requires all applicants to disclose any criminal convictions on application and re-enrolment.

If a criminal conviction is disclosed or otherwise brought to our attention, MTD will work with that person to determine the level of risk posed by the conviction to both the individual and/or to others. The individual will be required to complete a safeguarding risk assessment, providing MTD with further information about the offence and contact details for any relevant third party e.g. a Probation Officer.

The information given on the Disclosure Form will then be used to assess whether there is any risk posed should the individual enrol on a course at MTD. An interview must take place with one of the nominated Safeguarding Lead to enrolment to approve the application and sign the enrolment form. Where medium/high risk has been identified, this will be referred to the Safeguarding Operational Group and enrolment deferred until a decision is reached.

### **Concerns About Another Staff Member**

It is recognised that sometimes allegations may involve a member of MTD staff. In these circumstances the allegation must be reported directly to the Managing Director.

In the absence of the Managing Director, the Contracts Manager must be informed. On receipt of such an allegation, MTD's Disciplinary Procedures relating to allegations of abuse will be followed.

Additionally, the Chair of the Board will be notified if the allegations relate to the Managing Director.

### **Concerns About Safeguarding Practices**

All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the MTD's safeguarding practices and that such concerns would be taken seriously by the Management and Leadership Team.

If staff members have any concerns about the safeguarding regime, they should raise this initially with their Line Manager. If no immediate action is taken, then appropriate Whistleblowing Procedures are in place for such concerns to be raised with the Management and Leadership Team.

Where a staff member feels unable to raise an issue with MTD or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them: General guidance can be found at –

### Advice on whistleblowing.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 - line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## Responsibilities

### The Senior Leadership Team

The Senior Leadership Team will:

- Ensure that MTD has an effective Safeguarding Policy in place which is updated annually and that MTD contributes to inter-agency working in line with statutory guidance 'Working Together to Safeguard Children 2018' and 'Keeping Children Safe in Education 2018'.
- Ensure that the Safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children Board (LSCB).
- Ensure that MTD complies with the Prevent Duty as set out in the Counter Terrorism and Security Act 2015.
- Ensure that the policies and procedures in place enable appropriate action to be taken in a timely manner to safeguard and promote learners' welfare.
- Appoint a SLT Member with responsibility for Safeguarding and Prevent who will liaise with the Managing Director and the Designated Safeguarding Lead.
- Ensure that a Designated Safeguarding Lead is appointed to lead on safeguarding, advise/support staff and liaise with the Local Authority and other agencies. He/she will have status/authority to carry out the role e.g. commit resources to safeguarding and direct staff as appropriate.
- Give scrutiny to regular reports which will provide detail on the numbers and types of safeguarding incidents and concerns which have arisen, along with updates from Human Resources and Workforce Development.
- Ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay.
- Ensure that a member of the SLT is nominated to liaise with the designated officer for the relevant local authority and partner agencies in the event of a safeguarding allegation being made against the Managing Director.

### The Managing Director

The Managing Director has the overall responsibility for and oversight of Safeguarding within MTD and will ensure through the MTD Management and Leadership Team that:

- Safeguarding policies and procedures and any linked Safeguarding policies are fully implemented and followed by all staff.
- All staff feel able to raise concerns about poor or unsafe practice regarding learners and that concerns will be addressed sensitively and in a timely and appropriate manner.
- Policy / procedures are available to parents / carers and employers on request.

### The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead/s will:

- Ensure that the Safeguarding Policy, including Prevent, is reviewed annually.
- Ensure that the Safeguarding Policy is made public and that parents/carers and employers are aware of the fact that referrals about suspected abuse or neglect may be made and the role of MTD in this.
- Provide an Annual Safeguarding report for the SLT, detailing any changes to the policy and procedures; training undertaken by self, staff with specific responsibility and all other staff and SLT members and number and type of incidents/cases.
- Ensure the quality assurance of the provision of safeguarding information, advice and guidance and procedures.

- Ensure there is liaison with employers providing Apprenticeships to ensure proper safeguarding arrangements are in place.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and, when deciding to make a referral, by liaising with relevant agencies.
- Keep detailed, accurate, confidential and secure written records of concerns, disclosures and referrals. Ensure all such records are kept confidentially and securely.
- Liaise with the Safeguarding Team / any other relevant staff to inform of any issues/ongoing investigations via the Safeguarding Operations Group.
- Ensure the Safeguarding Team acts as a key point of referral for learners/ staff /parents / carers/employers, offer advice, assess information promptly, take action or refer on to the Designated Safeguarding Lead so that MTD can respond swiftly and appropriately to all concerns referrals and disclosures.
- Have access to resources and attend any relevant or refresher training courses at least every two years.
- Ensure that a member of the Safeguarding Team attends case conferences, core groups, or other multi-agency planning meetings, contributes to assessments, and provides a report.
- Provide staff identification badges that must be worn during all working hours.

### Monitoring IT Usage/E-Safety

MTD are committed to keeping all apprentices and staff safe while online. Learners are given access to several online applications e.g.

- BUD- online portfolio
- BKSB- Maths and English portal

Training is given to apprentices in the safe and effective use of the applications and each application has its own terms, conditions and privacy policy's

MTD may signpost learners to external websites and part of agreed training activities. MTD makes every effort to ensure that these external links are safe. Learners are also provided with a link to a short awareness cyber security video embedded within all learning resource.

[VIDEO: Cybersecurity - How to Stay Safe Online?](#)

A summary of how to stay safe online is provided to all apprentices, within the learner handbook which include a link to the Child Exploitation and Online Protection commend website, where any worrying or suspicious activity can be reported.

[www.ceop.police.uk/ceop-reporting/](http://www.ceop.police.uk/ceop-reporting/)

### IT Security

Technology is an integral part of our business. However, it also poses risks in terms of data breaches, reputational damage and financial impacts.

- Any breach of the Policy will be dealt with under our Disciplinary Procedure, with a sanction up to and including Gross Misconduct (or termination of engagement), we may withdraw your Internet and/or email access.
- You must not interfere with the work of others or the system itself. The facilities must be used in a responsible manner
- Please refer to section 8 for the MTD Staff Handbook (IT Security policy) for a full list of prohibited activities and further guidance when in use of company IT facilities.
- Monitoring may include internet usage at the workplace, internet usage outside the workplace during working hours using Company systems or network, and internet usage using hand-held or portable electronic devices. MTD may also monitor internal emails.

## Prevent Duty

The Prevent Duty, introduced as part of the Counter-Terrorism and Security Act 2015, came into effect for key bodies including schools, health bodies and police on 1 July 2015. The duty commenced for higher and further education institutions from the 18 September 2015.

MTD and a legal responsibility to fulfil the Prevent Duty statement.

The aim of the Prevent Strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Act this has simply been expressed as the need to have “due regard to the need to prevent people from being drawn into terrorism”. This includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

Where deemed appropriate, MTD will seek external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities and prevent them becoming further radicalised.

### What Is Terrorism/Extremism?

Terrorism covers all forms of extremism both violent and non-violent and is defined in the national Prevent Strategy as any vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Prevent covers international and domestic terrorist threats, and includes the activities of far-right groups, and animal rights groups.

### What Is Radicalisation?

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups. There is no obvious profile of a person likely to become involved in extremism or a single indicator of when a person might move to adopt violence in support of extremist ideas.

The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. Safeguarding from extremism is no different to how staff would share a concern about drugs, physical and sexual abuse or any other safeguarding concern.

### What Is Channel?

Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk from radicalisation using collaboration between local authorities, statutory partners, the police and local community to:

- Identify individuals at risk of being drawn into terrorism
- Assess the nature and extent of that risk
- Develop the most appropriate support plan for the individual concerned

The following indicators identify factors that may suggest a young person, or their family may be vulnerable to being drawn into extremism:

- Identity crisis - distance from culture religious heritage and uncomfortable with their place in the society around them.
- Personal crisis - family tensions, sense of isolation, adolescence low self-esteem, disassociation from existing friendship groups and becoming involved with a new and
- different group of friends searching for answers to questions about identity, faith and belonging.
- Personal circumstances - migration, local community tensions, events affecting Country and region of origin, alienation from UK values having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy, unmet aspirations, perceptions of

injustice feeling of failure, rejection of civic life, criminality, experiences of imprisonment, poor resettlement, reintegration, previous involvement with criminal groups.

The process of radicalisation is different for every individual and can take place over an extended period or within a very short time frame. Potential indicators of radicalisation are listed below:

- Use of inappropriate language
- Possession or accessing violent extremist literature
- Behavioural changes (such as sudden mood swings, becoming withdrawn, increasingly argumentative)
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Articulating support for violent extremist causes or leaders
- Using extremist views to explain personal disadvantage
- Joining or seeking to join extremist organisations
- Seeking to recruit others to an extremist ideology

Any prejudice, discrimination or extremist views, including derogatory language, displayed by learners or staff will always be challenged and where appropriate will be dealt with in line with the Learner Disciplinary Policy and the Code of Conduct for staff.

Staff should use their professional judgement and discuss with a Designated Safeguarding Person if they have any concerns. Once assessed, and if appropriate, this will be referred into the Channel Panel Process as per the flowchart below on the following page.

MTD has an identified single point of contact (SPOC) in relation to Prevent which is the Designated Safeguarding Lead.

To protect apprentices from radicalising influences in line with the Prevent Duty all MTD staff must make sure that they:

- Undertake training in the Prevent duty as identified by MTD to ensure they have an understanding of the factors that make people vulnerable to being drawn into terrorism and that they are able to recognise this vulnerability and are aware of what action to take.
- Challenge any behaviour from apprentices, staff or other, that supports or promotes radicalised/extreme views/prejudice.
- Maintain an ongoing open narrative with apprentices /staff that seeks to allow the apprentice/staff member to express concern, ask questions and challenge inappropriate behaviours.
- Exemplify British/Community Values into their work and practice and that opportunities in the curriculum are used to promote these values to learners.
- Report any concerning issues to the DSL for further assessment and investigation.

### **Aims Of The Prevent Policy**

This policy has the following aims:

- To promote and reinforce a set of shared values, founded on tolerance and respect for others.
- To create a safe space for free and open debate.
- To promote a sense of community cohesion.



- To ensure that learners are safe and that we create an environment that is free from bullying, harassment and discrimination.
- To support learners who may be at risk from radicalisation and to be able to signpost them to further external sources of support where appropriate.
- To ensure that staff are aware of their responsibilities under this policy and are able to recognise and respond to vulnerable learners.

This policy should be read in conjunction with MTD safeguarding policy and procedures and the Equality and Diversity Policy.

## **British Values**

### **Defining British Values**

For the purposes of this policy British values will be defined as:

“democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different backgrounds, characteristics, beliefs and faiths”

## **Managing Risks & Responding To Events**

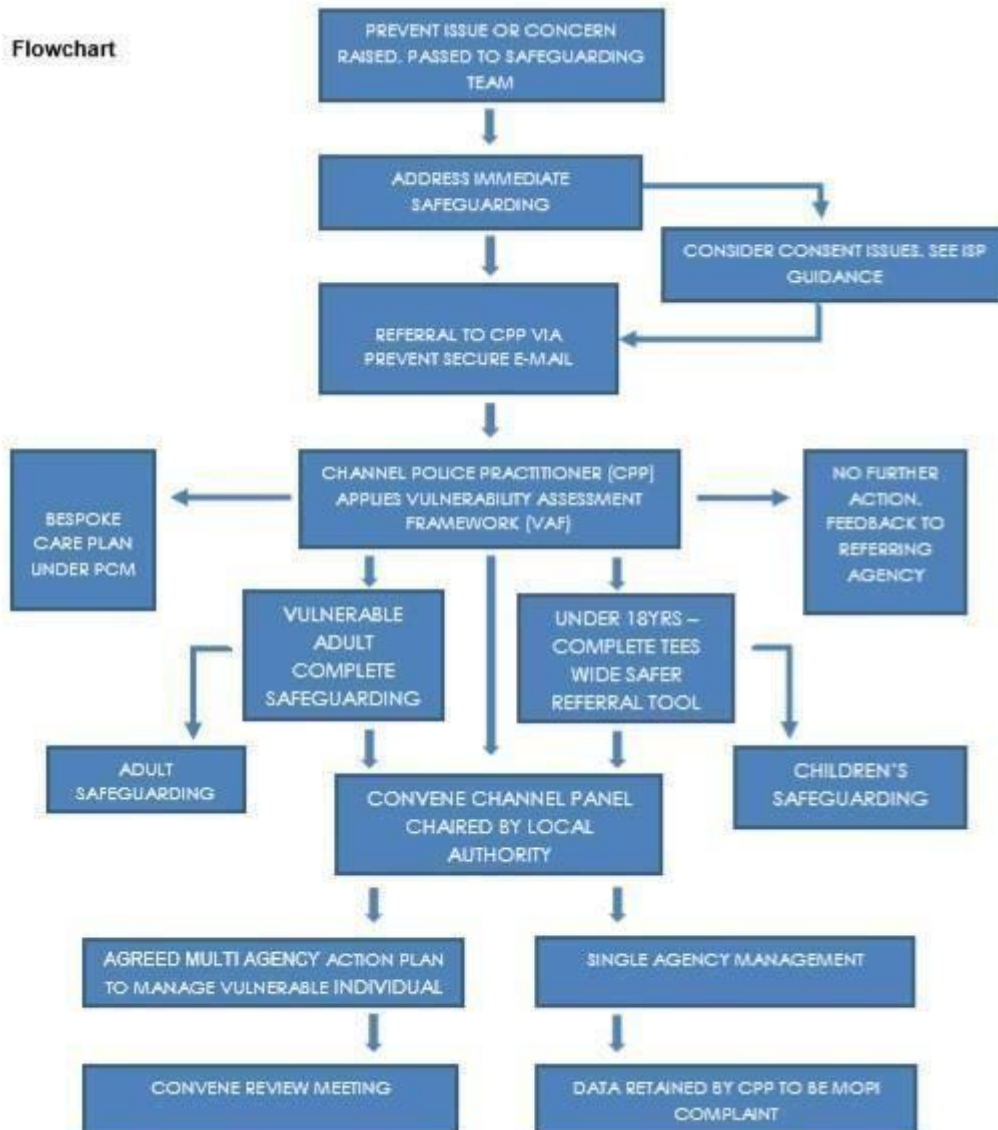
### ***Embedding values within the provision***

Equality and Diversity, the values of respect and tolerance will be embedded within teaching and learning sessions, learning materials and progress review meetings. Trainers will be empowered to encourage open and safe debate with support from specialist staff where this is deemed necessary.

### ***Coordination and overall responsibilities***

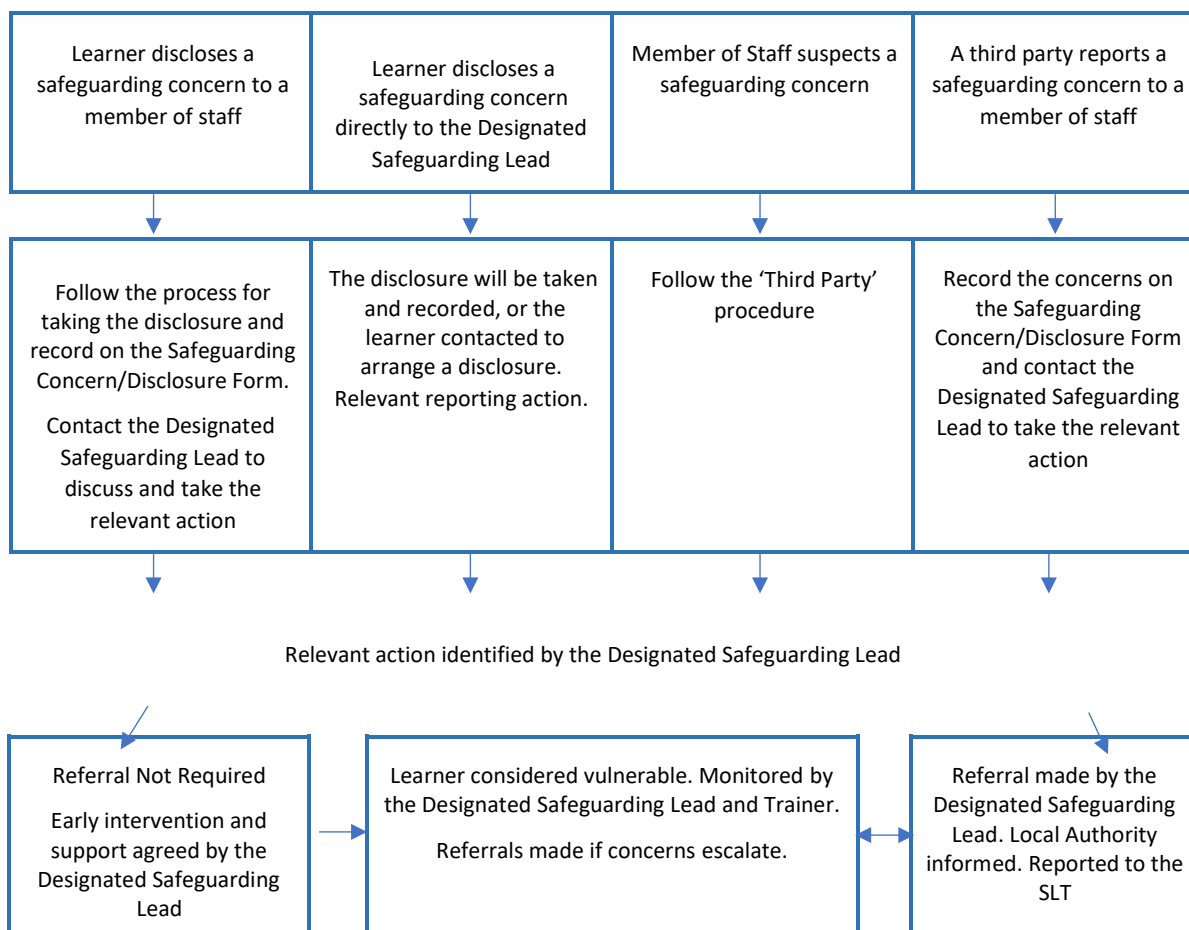
The Designated Safeguarding Lead, will have overall responsibility for the coordination of Prevent activity.

## The Official Referral Process For Prevent – Training Providers



CPP - Channel Police Practitioner CPP - Channel Police Practitioner PCM - Primary Care Manager

## Safeguarding Learners Procedure Flow Diagram



### Safeguarding/ Prevent Concern / Disclosure Form

Learner Name	
DOB	
Course	
Company	
Reported by	
Reported to	
Date Reported	
<p>Details / Type of Concern / Disclosure / Current external agency involvement (also note is there are any dependents associated with the learner).</p>	
<p>Action</p>	
<p>Referred / Not Referred To</p>	
<p>Follow Up / Outcome</p>	
Completed by:	Date: