

Safeguarding Policy

SAFEGUARDING POLICY

1. POLICY STATEMENT

The Businesses mission is to provide vocational education and training programmes to a wide range of learners and employers. We aim to engage actively with learners and employers to identify their training needs and then to provide cost-effective, flexible, and high-quality training programmes that enables learners to achieve and progress. Our vision is to transform lives through Education, Growing the learner and ensuring our employers and learners gain vital knowledge, skills, and behaviours. Our mission and vision are underpinned by our core values which are doing the right thing, innovation through technology, excellence and being the best. It is through our people that we will achieve our vision. They are the most important asset in our business, as they bring to life what we do. All employees act as representatives of the Business and our employer brand. The success of a sector, function or department depends on the performance and behaviours of our people.

The Business 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 at risk; however; The Business 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:

- Children Acts 1989 and 2004
- The Education Act 2011, and in line with the government publication:
- Keeping Children Safe in Education and Working Together to Safeguard Children (2019) the statutory guidance
- Keeping Children Safe in Education or Working Together to Safeguard Children (2019)
- The Local Safeguarding Children Board (LSCB) procedures.
- The Safeguarding Vulnerable Groups Act 2006 (amended by the Protection of Freedoms Act 2012)

2. POLICY OBJECTIVES

The aim of the policy is to ensure you are aware of and understand your responsibilities, that of others, signs there might be a safeguarding concern, along with the reporting procedures for all safeguarding issues.

The Business recognises that safeguarding and promoting the welfare of its learners is everyone's responsibility. Everyone who comes into contact with a learner and their families, carers and employers has a role to play in safeguarding. The safeguarding policy is shared with all staff, learners and employers on an annual basis and as and when any in-year updates are made aligned to legislation changes. The policy, its purpose and reporting procedures will be reinforced via team and employer meetings, staff training, learning resources and literature. 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.

3. KEY CONTACTS

For safeguarding concerns and referrals, you must contact the Designated Safeguarding and Prevent Officer (DSO). If you are not able to contact the DSO you must contact the Deputy Designated Safeguarding and Prevent Officer.

There is a designated safeguarding email for all staff and learners to be able raise concerns or referrals of safeguarding, which is safeguarding@mtstrainingltd.com

This email is regularly checked during the Businesses core working hours, Monday to Friday 9am-5pm, please note that the Business is not open on bank holidays or between December 25th to January 1st. This email has an automated response with advice on how to manage the situation and additional points of contact.

Designated Safeguarding and Prevent Officer: Karen Julier

T: 07518906151

E: karen.julier@mtstrainingltd.com

Deputy Safeguarding and Prevent Officer: Emma Merrick

T: 07834731914

E: emma.merrick@mtstrainingltd.com

4. WHO NEEDS TO KNOW ABOUT THE POLICY?

This policy covers safeguarding of children and adults at risk, both our in training learners, learners during EPA, learners within sub-contracted provision, and those persons in settings in where we practise which fall into the category of child or adult at risk. It is inclusive of specific highlighted safeguarding agenda areas, as defined by law, and in the wider context all our learners. This policy also aligns our compliance with the Government Prevent strategy.

5. DEFINITIONS

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances. The safeguarding agenda includes a wide range of potential risks (see Appendix K for full definitions and indicators of a safeguarding concern).

- Abuse (physical, emotional, financial, institutional, sexual, and organisational)
- Self-neglect
- Discrimination
- Child sexual exploitation
- Bullying and cyberbullying
- Domestic abuse
- Substance misuse
- Fabricated or induced illness
- Faith abuse
- Forced marriage
- Gang and youth violence
- Private fostering
- Female genital mutilation (FGM)
- Gender based violence
- Radicalisation
- Sexting
- Teenage relationship abuse
- Trafficking and modern slavery
- Breast ironing
- Mental health concerns
- Sexual violence and sexual harassment
- Children missing in education.

A child is defined as anyone under the age of 18. An adult at risk (previously vulnerable adult) is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance. Alongside the safeguarding agenda above this could be due to, and not limited to any of the following:

- Living in sheltered housing
- Receiving any form of health care
- Receiving a welfare service in order to support their need to live independently
- Receiving a service due to their age or disability
- Living in residential accommodation such as a care home
- Receiving domiciliary care in their own home
- Expectant or nursing mother living in residential care

- Person under supervision of probation service

While the definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors. This is termed contextual safeguarding. Examples of areas to consider are:

- Poor numeracy and literacy skill, or specific learning need
- English not a first language
- Unsupportive employer
- Under-represented group
- Acting as a carer for another family member
- Background in offending or is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is disabled or has a social need
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Is a young carer
- Is frequently missing/goes missing from care or from home
- Is within a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse or generally unsupportive.

Regulated activity is a term that defines activities that an individual engages in. The criteria for regulated activity differ for adults and children .

- Regular activity (once per week or 4 times over the course of 1 month)
- Unsupervised activity
- Teaching, training, assessing, mentoring based activities in relation to nonwork-related activities - working intensively and closely with a child
- Within specified setting Adult
- Health care professionals - giving first aid or receiving first aid
- Receiving or giving personal assistance to those due to age, illness or disability (going to the toilet/washing/nutritional advice)
- Providing social care - being subject to or assessing the need for health/social care
- Providing assistance in someone's personal affairs or allowing someone else to do so
- Provide assistance with cash, bills and shopping (allowing someone else to or shopping on someone's behalf)
- Person who transports or is transported because of their illness

Individuals must not engage in regulated activity with either children or adults at risk if they have been barred from doing so by the Disclosure and Barring Service (DBS) scheme.

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 education needs and 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.

6. OUR RESPONSIBILITY

We all have a responsibility to ensure that children, young people and adults at risk are protected from harm, informed about potential risks to their welfare, and understand how to seek help. We ensure all concerns are dealt with timely and appropriately. We also have a responsibility to minimise the risk of allegations against you.

All staff are expected to comply with any DBS check request and to have a good understanding of what constitutes a safeguarding or welfare concern and how to provide support, guidance in such instances and the channels for escalating a concern. To assist you in this, on-going training and awareness, as well as continuous information, advice and guidance will help you to feel confident in proactively promoting safeguarding and understanding your individual responsibilities. The responsibilities of particular individuals are detailed below:

Our Directors - to ensure we have effective policies which are implemented and followed.

Designated safeguarding and prevent lead:

- Maintain links with local children safeguarding boards or where in place local multi agency safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups), and Prevent coordinators
- Inform and advise all parties on legislation changes and current safeguarding themes
- Plan and implement training for all employees including CPD, quality assurance and standardisation for the designed safeguarding officer team
- To deal with employee concerns over learner's welfare, signpost and offer guidance

- Carry out investigations where appropriate into welfare concerns reported and liaise with external bodies such as Local Children’s Safeguarding board or where in place Local Multi agency Safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups) where appropriate
 - Support and coordinate escalation process
 - Overall management of safeguarding issues and report to board on any issues that arise
 - Review procedures and policies on a timely basis.
 - Maintain own CPD to ensure their role can be fulfilled competently.
 - Monitor the safeguarding email inbox twice a day
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- Deputy safeguarding and prevent lead – they are they to ensure there is also a lead safeguarding officer available during our core working hours to ensure all referrals and concerns are managed timely. They complete the same training and the lead.

Our trainers - to check safety and welfare with all learners at each visit/communication, ensuring learners complete all safety related learning activities within their programme.

You must be aware of indicators and that there may be a safeguarding issue (Appendix K), and if required to follow the 5 R’s procedure, our flow chart for reporting issues that concern them or are reported to them (Appendix D- I). To provide support and referral to external agencies as they see fit, if comfortable to do so, and then inform safeguarding team of their actions. To carry out training as directed by the safeguarding team in a timely manner.

Support Teams - must be mindful of indicators that there may be a safeguarding issue should you come into contact with a learner or potential learner (Appendix K), and if required to follow the 5 R’s procedure. Our flow chart for reporting issues that concern them or are reported to them (Appendix D - I). To carry out training as directed by the safeguarding team in a timely manner.

The topic of Safeguarding can be very sensitive due to the content and may be difficult for you to discuss. If you have any concerns over issues raised, please contact the lead designated Officer as quickly as possible.

7.SAFER RECRUITMENT

The Business carries out a safe recruitment process and ensures that all appropriate checks are carried out on new staff that will work or come into contact with children and adults at risk in line with the Disclosure and Barring Service requirements.

See safer recruitment policy for further detail on recruitment procedures.

7.1. DISCLOSURE AND BARRING SERVICE CHECKS

The Disclosure and Barring Service (DBS) is an executive agency of the Home Office and its primary purpose is to help employers make safer recruitment decisions and appointments.

By conducting checks and providing details of criminal records and other relevant information, DBS helps to identify applicants who may be unsuitable for certain work and positions, especially those involving contact with children (those less than 18 years old) or adults at risk.

Depending on the type and regularity of contact with children or adults at risk involved in a particular role, employers are entitled to make appropriate types of enquiry about the applicant's criminal record and seek a disclosure through a DBS check.

The Business can undertake six types of criminal records checks depending on the role applied for:

- STANDARD DBS CHECK

This will be for positions that are included in the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975. This type of check contains details of individual's convictions, cautions, reprimands or warnings recorded on police central records and includes both 'spent' and 'unspent' convictions that will be shown on a criminal records check.

- ENHANCED DBS CHECK

This will be for positions included in both the ROA 1974 Exceptions Order and in the Police Act 1997 regulations. This type of check contains the same details as the standard check plus any information held locally by police forces that it is reasonably considered to be relevant to the post applied for.

- ENHANCED DBS & BARRED LIST CHECK (CHILD)

An enhanced check with information from the DBS's children's barred list is only available for those individuals engaged in regulated activity with children and a small number of posts as listed in the Police Act 1997 regulations.

- ENHANCED DBS & BARRED LIST CHECK (ADULT)

An enhanced check with information from the DBS's adults barred list is only available for those individuals engaged in regulated activity with adults and a small number of posts as listed in the Police Act 1997 regulations.

- ENHANCED DBS & BARRED LIST CHECK (CHILD AND ADULT)

An enhanced check with information from the DBS's children and adults barred list is only available for those individuals engaged in regulated activity with both vulnerable groups including children and a small number of posts as listed in the Police Act regulations.

7.2. WHEN AND WHAT TYPE OF DBS CHECK IS APPROPRIATE

The recruiting director and lead designated safeguarding and prevent officer are responsible for deciding which level of check is appropriate for a particular role and whether barred list checks are necessary. Even where a post has some contact with children or adults at risk, the definition of regulated activity may not be fully satisfied, but in order to safeguard our learners any unsupervised contact with learners will result in an enhanced DBS check with child barred list. The Safeguarding Vulnerable Groups Act 2006 (amended by the Protection of Freedoms Act 2012) defines what types of activities involving children and adults at risk are regulated and therefore require barring list checks. Appendix A specifies current posts at Lifetime that require DBS and/or barring list checks.

How we meet our responsibility towards this is explained below.

Where The Business is recruiting for a role that qualifies for a DBS disclosure, the advert and further information will confirm the type of DBS disclosure required. When the most suitable candidate for the position has been identified, the offer of appointment will be made subject to a satisfactory DBS check, right to work, references and qualification checks.

In the instance that the outcome of a DBS check has not been received from the appropriate authority prior to learner visits being carried out, all visits with learners aged below 18 will be supervised by a person whose DBS outcome has been received and approved. The line Manager will be responsible for arranging this supervision.

As a DBS check forms part of our recruitment process, we encourage all candidates to declare anything relevant to the type of disclosure required for the role they applied for. Once an offer has been made, candidates should tell us of any further details of convictions, including those that normally would be considered as spent, cautions or reprimands.

As part of our safeguarding obligations, we will re-apply for the appropriate types of DBS checks on a 3-year basis during employment with The Business.

If someone is already part of the DBS update service, we will request an updated check for that number and do so every three years.

7.3 CONFIDENTIALITY

Information provided in a DBS disclosure report will be kept confidential and only on a need-to-know basis. Such information will be handled in accordance with Lifetime's 'Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information', (Appendix B).

Any other information regarding offences must be kept securely and in accordance with The Businesses data protection policy.

We recognise that job applicants and our employees need to feel confident that information about their convictions will not be disclosed to colleagues unless there is a specific reason for doing so. Those involved in recruitment decisions will ensure that when appointing an

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individual with a conviction, they are advised as to whom within The Business knows of their conviction and the reasons why the information has been disclosed.

7.4. FAILURE TO DISCLOSE INFORMATION RELEVANT TO THE TYPE OF DBS CHECK APPROPRIATE TO YOUR ROLE

Having a criminal record does not necessarily prevent an individual from working at The Business. The decision as to whether a person with a criminal record should be appointed, or an offer of employment withdrawn, or employment terminated will be taken only after careful and thorough consideration of the outcome of any DBS check as well as the job and offence related factors as explained in 8.6.

Nonetheless we request all employees to tell us about any information relevant to the type of DBS check appropriate for their role. This could mean, for example, that if your role requires satisfactory Enhanced DBS and barring check, you need to tell us about any convictions, cautions or reprimands or being barred from working with children as soon as any of these have been issued. Failure to disclose information relevant to the type of DBS check appropriate to your role would be seen by The Business as a breach of trust and confidence. Such acts are considered as gross misconduct and you would be invited to a disciplinary hearing with a potential outcome of instant dismissal.

7.5 EXPLORING THE RELEVANCE OF INFORMATION PROVIDED IN THE DISCLOSURE REPORT

As we explained in the previous section having a criminal record does not necessarily prevent an individual from working at The Business. The decision as to whether a candidate with a criminal record should be appointed, or an offer of employment withdrawn, will be taken only after careful and thorough consideration of the outcome of any DBS check as well as the job and offence related factors as explained in section 8.6.

Similar to the recruitment process, a disclosure of a criminal record will not necessarily lead to termination of your employment with us and the decision will be taken only after careful and thorough consideration of the job and offence related factors. Any decision to terminate employment would follow our Disciplinary Policy (or Probationary Policy if you have not yet passed your probation).

A director alongside the lead designated safeguarding and prevent officer will make an initial assessment of the content of the disclosure report. If the report provides no evidence of convictions or any other related information, no further action will be taken. If the report confirms a conviction or any other related information, a director alongside the lead designated safeguarding and prevent officer will make an initial assessment of whether the information provided has any potential relevance to the post. If there is clearly no potential relevance, no further action will be taken.

If the report confirms a potentially relevant conviction or any other potentially relevant information further exploration will be required following the process outlined below.

7.6. EXPLORING A CONVICTION AND ITS RELEVANCE

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All discussions relating to convictions must take place after the selection process has been completed and will involve the hiring manager and a director and if appropriate, the lead designated safeguarding and prevent officer. As part of the decision-making process they will normally meet with the individual to gain more information from the person about the nature and circumstances of any conviction.

The suitability for employment of a person with a criminal record will clearly vary, depending upon the nature of the job and the details and circumstances of any convictions. The decision will be made on the basis of a risk assessment to enable the applicant's criminal record and circumstances to be assessed in relation to the tasks he or she will be required to perform and the circumstances in which the work is to be carried out. The following job-related factors should be taken into account:

- Does the post involve direct contact with learners or the public?
- What level of supervision will the post-holder receive?
- What level of trust is involved? Will the nature of the job present any opportunities for the post-holder to reoffend in the place of work?
- Does the post involve any direct responsibility for finance or items of value?
- Does the post involve any contact with children or other vulnerable groups of learners or employees?

The assessment is also likely to include consideration of the following factors relating to the individual's offence(s):

- The seriousness of the offence(s) and relevance to the safety of other employees, students, research subjects, the public etc
- The length of time since the offence(s) occurred
- Relevant information offered by the person about the circumstances that led to the offence(s) being committed, for example the influence of domestic or financial difficulties.
- The degree of remorse, or otherwise, expressed by the person and their motivation to change
- Whether the offence was a one-off, or part of a history of offending
- Whether person's circumstances have changed since the offence(s) was committed, making re-offending less likely
- Whether the offence has since been decriminalised.

Following careful and thorough consideration of all these matters and consultation with the Director a decision will be made as to whether the individual should be appointed. If appropriate we may seek further information from relevant bodies when reaching this decision. If the decision is not to appoint, a letter will be sent to the individual confirming the reasons for this decision.

The above process will also be followed in the event of a criminal conviction coming to light after the formal offer of employment has been made or during employment. In such cases

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The Business would reserve the right to withdraw the offer of appointment where appropriate or terminate employment in line with the Businesses disciplinary policy (or probationary policy if in probationary period).

8. REPORTING A SAFEGUARDING CONCERN

8.1 If a learner raises a concern/allegation with you

If the learner has a concern over their own personal welfare and wellbeing, you are to listen to and record all information given, making no judgement or assumptions. Take any actions required to secure the immediate safety of the child or adult at risk if deemed appropriate, this may involve staying with them until a responsible adult can be located. This will only be recorded on the Bud review if learner agrees and raised with the manager if learner agrees. If the learner gives consent you must report the issue to a designated officer. If you feel the learner's safety and wellbeing are at risk and they do not give consent for the matter to be escalated, you should escalate only when you believe the matter would deteriorate if additional support was not sourced. You should always consider the wishes of the individual, even those aged under 18. Guidance should be sourced with the lead safeguarding and prevent officer if you are unsure. The lead safeguarding and prevent officer will then decide the appropriate course of action, and if a referral outside the organisation is appropriate.

8.2 If a trainer or others have concerns over a learner

This might be through observation, alleged by others or discussion. You must follow procedure set out in 8.1. If a learner raises an issue/allegation with the trainer

8.3 If a learner/parent has a concern/allegation about a member of The Business staff/ visitor/ subcontractor

All learners are to be informed that if they have a concern over their own personal welfare and wellbeing that they do not feel comfortable talking to their trainer, they are to contact The Businesses lead designated safeguarding and prevent officer. Contact details for the designated person are available in point 3 of this policy.

The safeguarding policy is also available on the Business external website.

8.4 If a parent contacts you to report a concern about their child

Ensure you listen and record the details as per a learner reporting a concern to you. Ensure you have contact details for the parent. You must report the issue to the lead designated safeguarding and prevent officer. They will then decide the appropriate course of action, and if a referral outside the organisation is appropriate, liaise with the parent as appropriate. Be mindful of confidentiality as all learners aged 16 and above and of employed status are

deemed to be adults, and therefore no information should be passed to parents or carers without prior consent to do so from the learner.

8.5 If you observe a safeguarding issue taking place within the working practices of an employer's setting or during the Businesses delivery sessions including subcontracted provision

An example of this could be a trainer hitting a child or observing inappropriate restraint techniques or learner verbally or abusing each other.

Take action to stop the activity immediately, and inform the individual of your concerns, ask them to remove themselves from the area and advise them you will inform their line manager.

Take any actions to secure the safety of the child or adult at risk, this may involve staying with them until a responsible adult can be located. Inform your designated safeguarding officer in all cases.

Be mindful of differences between poor practice and a safeguarding issue and apply your action appropriately.

8.6 If a learner reports unsafe practices or safeguarding issues to you within their working/learning environment

Advise the learner to follow their employers reporting or whistle blowing procedures. If it is related to an The Business learner activity session, follow The Businesses safeguarding reporting procedures.

You may support the learner in speaking to the appropriate senior team members if appropriate.

Report the incident to the lead designated safeguarding and prevent officer who will offer additional guidance and signposting for the learner and will monitor.

8.7 General guidance

It is important you do not pass any information to other parties or try to investigate the concern yourself. All concerns should be reported to safeguarding@mtstrainingltd.com in the first instance.

If you require an immediate response call the lead designated safeguarding and prevent officer immediately, it is noted that the designated officer may not be available out of our core working hours, so in circumstances where the individual is in immediate danger report the incident to the police on 999.

The lead designated safeguarding and prevent officer will endeavour to make initial contact with regards the concerns within 72 hours.

The lead designated safeguarding and prevent officer will assess if the individual is at risk of significant harm and decide upon the next course of action, this can range from offering signposting to support agencies to referral to the police and local safeguarding authorities. This may also involve passing information to the DBS.

Also be mindful of any subcontract arrangements in place for the learner. In some instances, safeguarding officers at other companies might need to be informed. Ensure you pass to the safeguarding officer the name of the subcontractor.

1. TRAINING AND EDUCATING EMPLOYEES

Each member of the team holds as a minimum a formal level 1 safeguarding qualification and undertake regular CPD events and standardisation meetings to keep updated with legislation and refresh their knowledge.

All employees undertake a safeguarding induction and complete a level 1 online course specifically for Safeguarding Young Vulnerable People.

The Directors, Lead and Deputy Lead safeguarding and prevent officers will annually read the current keeping children safe in education publication.

All trainers will annually read part 1 of the current keeping children safe in education publication.

The training received is continually reviewed to ensure most appropriate and up to date training is given. Aligning with the mandatory duty surrounding the Governments Counter Terrorism and Security Act 2015 all staff undertake Prevent training aligning with their role within The Business.

Periodic updates surrounding key safeguarding concepts are communicated monthly via the internal communication channels. Monthly focus topics are also distributed via these internal communication channels to raise awareness and promote discussion in all areas under the wider safeguarding agenda including areas such as radicalisation, mental health issues, positive relationships, and staying safe on the internet, which will educate employees alongside giving greater knowledge to be passed onto learners.

There is reference to safeguarding in all team meetings carried out monthly, with managers utilising the information in the monthly safeguarding and equality newsletters to stem discussions.

There is also an annual CPD update for formal procedures.

2. KEEPING YOURSELF SAFE

To maintain yours and learner's safety, the following are strictly prohibited:

- Befriending learners on personal social media sites
- Distributing personal telephone numbers

- Visit learners at home or transporting learners to and from locations (this includes travelling in a car with a learner driving)
- Do not use sarcasm, insults or belittling comments towards learners
- Personal relationships with learners

It also important to be mindful of the following when conducting yourself:

- Locations of one to one meeting with colleagues. These should take place at a neutral location
- You will naturally build a rapport with learners through the apprenticeship contact, and the learners may see you as a confidante and support but be sure to maintain professional boundaries whenever carrying out work on The Businesses behalf.
- Be respectful of all young and vulnerable people, and appreciate you are in a position of trust. We can listen to their concerns and support them
- Uphold confidentiality within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so.
- Avoid spending time alone with learners in a closed environment. If this is unavoidable for example during a formal assessment/examination, ensure a member of the site staff is aware where you are and monitors this.
- Be careful when giving learner advice as this is based on your opinion, focus support around information (facts) and guidance (signposting).
- Be mindful of any learners you acquire that by default creates a conflict of interest i.e. a partner or friend becomes a learner. Discuss appropriateness/alternative trainer arrangements with your line manager
- If a learner offers you gifts of any sort as a result of the support through their programme, please refer to the bribery policy for the process to follow
- If at any point you feel unsafe in a learner's company inform the site manager, your line manager, the lead designated safeguarding and prevent officer and leave the premises.

3. KEEPING LEARNERS SAFE

There is an employer guide to welfare that is distributed to employers to help them understand the Businesses own responsibilities under safeguarding, health and safety and Prevent agenda.

Health and safety vetting and monitoring is carried out during learner induction, this involves a discussion between the trainer, employer and learner and allows for the trainer to be confident in the employers ability to keep the learner safe during their employment and also to help educate the learner in looking after their own welfare and that of others while at work.

Learners are made aware of all of the Businesses relevant policies, who the designated persons are and how to report a concern during their induction to the programme. There is

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also a dedicated support site on the learner social responsibility community to signpost them to information, advice and guidance for a wide range of support needs, and a direct email address to allow the learners to access support from the designated safeguarding officer confidentially.

Monthly topics in relation to equality and diversity and safeguarding are discussed during each apprenticeship visit. Learning surrounding these activities is discussed and documented at each visit, along with pastoral checks.

Where the Business acts a lead provider, providing funding to other companies, we will endeavour to provide appropriate training and guidance to subcontracts to ensure the Businesses policies and procedures are followed alongside the due diligence checks carried out. This will be monitored.

4. LEADERSHIP AND MANAGEMENT

A dedicated safeguarding board including all directors and the head of quality of education, meet quarterly providing a greater focus on safeguarding and safety of learners. The effectiveness of all welfare support and educational material is analysed periodically by Learner Voice.

5. CONCERNS ABOUT SAFEGUARDING PRACTICES

All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the the Businesses safeguarding practices and that such concerns would be taken seriously by the leadership and management 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 directors. Guidance can be found in the whistleblowing policy.

6. FURTHER SUPPORT

Keeping children safe in education:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

The education Act 2011:

<http://www.legislation.gov.uk/ukpga/2011/21/contents/enacted>

Children's Act 1989:

<http://www.legislation.gov.uk/ukpga/1989/41/contents>

Children's Act 2004:

<http://www.legislation.gov.uk/ukpga/2004/31/contents>

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.

7. RELATED POLICIES

- Statement on the Secure Storage, Handling, Use, Retention and Disposal of Disclosures and Disclosure Information
- Equality and Diversity Policy
- Grievance Policy
- Disciplinary Policy
- Social Networking and Media Policy
- Probation policy
- Anti-Bribery policy
- Safer recruitment policy

8. APPENDIX

Appendix A – list of posts that require appropriate type of DBS and barring checks

Job role	No check	Enhanced DBS check	Enhanced DBS check (child barred list)
Tutor / Trainer / IQA			X
Director			X
Head of Quality			X
Head of Training			X
Telesales		X	
Office support/admin	X		

Appendix B – statement on the secure storage, handling, use, retention and disposal of disclosures and disclosure information

GENERAL PRINCIPLES

As an organisation using the Disclosure and Barring Service (DBS) to help assess the suitability of applicants for positions of trust, The Business complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of disclosures and disclosure information. It also complies fully with its obligations under the Data Protection Act and other relevant legislation pertaining with the safe handling, use, storage, retention and disposal of DBS disclosure information.

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STORAGE AND ACCESS

Disclosure information is never kept on an applicant's personnel file and is always kept separately and securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties. Handling In accordance with section 124 of the Police Act 1997, disclosure information is only passed to those who are authorised to receive it in the course of their duties. The directors will be responsible for maintaining a record of all those to whom disclosures or disclosure information has been revealed. It is recognised that it is a criminal offence to pass this information to anyone who is not entitled to receive it. Usage Disclosure information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

RETENTION

Once a recruitment (or other relevant) decision has been made, the Business does not keep disclosure information for any longer than is absolutely necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints. If, in very exceptional circumstances, it is considered necessary to keep disclosure information for longer than six months, will consult the DBS about this before doing so. Throughout this time, the usual conditions regarding safe storage and strictly controlled access will prevail.

DISPOSAL

Once the retention period has elapsed, the Business will ensure that any disclosure information is immediately destroyed by secure means, i.e. by shredding or confidential waste disposal. While awaiting destruction, disclosure information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack). The Business will not keep any photocopy or other image of the disclosure or any copy or representation of the contents of a disclosure. However, the Business will keep a record of the date of issue of a disclosure, the name of the subject, the type of disclosure requested, the position for which the disclosure was requested, the unique reference number of the disclosure and the details of the recruitment decision taken.

Appendix C- DBS disclosure process

The Business uses dbscheckonline.org.uk who is a registered body responsible for authorising and processing applications for DBS checks Successful candidates will be sent a DBS disclosure application form and guidance with the written offer of employment.

The completed disclosure form and associated ID documentation must be verified in person. This can either be done by bringing the documents to the hiring manager, who will authenticate and scan the documents then forward to HR@logisticsukltd.com; or the individual can bring the documents to their first day of induction.

HR are responsible for checking the form is fully completed, confirm which type of disclosure is required and will forward to dbscheckonline.org.uk.

dbscheckonline.org.uk will then process the application and return a disclosure report to HR@mtstrainingtd.com, with a copy also sent to the individual. The published DBS turnaround time is 2- 7 working days. However, certificates are issued by Disclosure Scotland and The Disclosure & Barring Service England & Wales, and therefore the issue time may take longer. Also, please note that it could take longer if further information is requested by dbscheckonline.org.uk and / or the Disclosure & Barring Service.

Wherever possible the DBS disclosure should be obtained prior to the individual commencing employment, but sometimes this may not be possible. In such cases the individual can commence employment but only on a supervised basis for those aspects of the job involving contact with children or adults at risk until such time as a satisfactory disclosure report is received.

In some cases, an applicant may already have received a satisfactory disclosure report for their current or a previous position at The Business. It may be appropriate to use the existing report to assess suitability for the post, taking account of the date the report was produced and similarities between the two positions. Dominic Davies should be consulted in such cases.

Disclosure reports for applicants with a substantial record of overseas residence, including current UK residents and British nationals, may not include information on convictions from outside the UK. In most circumstances however, a disclosure report should still be sought. The DBS can also offer guidance on the availability of criminal record checks in a variety of foreign countries and the applicant can be requested to obtain the equivalent checks from the country in question, where available.

Commonly referred to as the 5 R's.

Recognition

Signs of abuse can be difficult to spot, as can a learner trying to find the right language to tell you about a concern. If you have any concerns over the welfare of the learner from what you have seen, heard, discussed with the learner or you have noticed changes in their behaviour which cause you safeguarding concerns, you must report it to the lead designated safeguarding and prevent officer. You do not personally have to believe the concerns in order to raise them, any concerns raised should be taken seriously. See appendix K for indicators of abuse to help.

Response

No report or concerns about possible abuse should be ignored. Your main role is to listen and record with no judgements or leading questions; use open question to gather factual details for example when did it take place, who said what, what happened? You must stay calm and not let the learner know if you feel panicked or shocked. Do not make any promises about what will happen next, but only that you will pass it onto the lead designated safeguarding and prevent officer, and that we will do everything we can to help. It is good practice to show support and reassurance but be mindful to maintain a situation where you do not put yourself at risk. It would also be useful to have information regarding current agency support – i.e. have the police already been informed, is the person receiving local authority or medical support?

Record

Ensure you record notes of the incident or disclosure as close to the time as possible. The notes should be dated and signed where possible. The notes should detail what you saw/heard or what was discussed with an individual, the names of those involved and the time, location and what action you took. Use the disclosure form where possible, but any form of notes will be acceptable.

Report

Report the concerns to the lead designated safeguarding and prevent officer, ensuring you have recorded all details as above. This communication can be face to face, via email, or phone call followed up by email. All communication and documents will remain confidential between them and the individual that has reported it, unless the lead designated safeguarding and prevent officer deems it appropriate to take further action and involve other agencies.

Referral

The lead designated safeguarding and prevent officer will then take the decision of what course of action should be taken. It is only them that should be taking the decision to make referrals outside of the organisation.

Reviewed –July 2021

Safeguarding policy

Appendix E - indicators of abuse

Reviewed –July 2021

Safeguarding policy

Safeguarding issue	Concern	Indicators
Physical abuse	Deliberately causing physical harm	Cuts, bruises, burns, Wearing long sleeved clothes Pain Cowering
Neglect	The persistent failure to meet a person's basic physical and/or psychological needs, likely to result in serious impairment of health or development. Neglect is when a parent or carer fails to provide adequate food, clothing, shelter (including exclusion from home or abandonment), medical care, or protection from physical and emotional harm or danger	<ul style="list-style-type: none"> •Withdrawn •Weight loss • Fear of going home • Improper hygiene • Confusion • Inappropriate clothing
Self-neglect	Neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as	<ul style="list-style-type: none"> • Poor diet and nutrition • Poor personal hygiene • Not taking prescribed medication • Substance misuse • Doesn't always encompass all areas of life
Psychological abuse	Emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.	<ul style="list-style-type: none"> • Withdrawn • Depression • Lack of confidence • Socially awkward • Easily manipulated
Financial abuse	Theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or	<ul style="list-style-type: none"> • Change in appearance • Having expensive gadgets • Having no money • Not eating properly

	financial transactions, or the misuse or misappropriation of property, possessions or benefits.	
Sexual abuse	Forcing or enticing a child or young person or any person to take part in sexual activities, whether or not the person is aware of what is happening, could also be indecent exposure or sexual harassment.	<ul style="list-style-type: none"> • Spending a long time in the toilet • Discomfort in sitting down • Inappropriate behaviour
Organisational abuse	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.	<ul style="list-style-type: none"> • Activity defined by a regime /task orientated setting • Dismissive of complaints Learner may need to leave at certain times • Ask permission to do everything • Appear brainwashed
Discrimination	The unjust or prejudicial treatment of different categories of people, especially on the grounds of one of the protected characteristics	<ul style="list-style-type: none"> • Fearful of certain people • Avoiding certain situations • Being asked to do more work than they should
Child sexual exploitation	Sexual abuse involves forcing or enticing a child or young person or any person to take part in sexual activities, whether or not the person is aware of what is happening, could also be indecent exposure or sexual harassment.	<ul style="list-style-type: none"> • Change in behaviour • Change in appearance • Increased sexualised behaviour/language • Drug/alcohol abuse • Suddenly wearing expensive things
Bullying including cyberbullying	Behaviour by group of individual repeated over time that intentionally hurts	<ul style="list-style-type: none"> • Withdrawn/nervous • Signs of physical and emotional abuse

	another individual or group either physically or emotionally (can be face to face, over text, social media exchanges)	<ul style="list-style-type: none"> • Constant use of or fear of internet usage
Domestic violence	Incident of pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who have been intimate	<ul style="list-style-type: none"> • Signs of physical or emotional abuse • Show signs of being controlled family members, can also be honour based • Withdrawn • Anxious around others • Low self esteem
Drugs	Alcohol, tobacco, illegal drugs, medicines or psychoactive substances	<ul style="list-style-type: none"> • Smelling of alcohol • Regular hangover symptoms • Inability to concentrate • Lateness • Change in commitment levels
Fabricated or induced illness	Making up signs and symptoms of an illness, falsifying medical records or inducing an illness to someone by any means	<ul style="list-style-type: none"> • Child could pretend to be ill, think ill, and talk about persons taking them to Drs or hospital. • Parents could talk about child consistent illness
Faith abuse	Child abuse related to faith or belief, include concepts of witchcraft and spirit possession, rituals and sacrificial murders	<ul style="list-style-type: none"> • Talking about beliefs and faith related activities • Engaged or family engaged with
Forced marriages	One or both spouses do not or cannot, due to vulnerabilities, consent to marriage and duress is involved	<ul style="list-style-type: none"> • Travel abroad recently • Talking about getting married/meeting men through family connections • Upholding religious duties
Breast ironing	The pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically carried out by the girl's mother who will say she is trying to protect the girl	<ul style="list-style-type: none"> • Unusual behaviour after an absence from work or learning. Including depression, anxiety, aggression, withdrawn etc.; • Reluctance in undergoing normal medical examinations; • Some girls may ask for help, but may

	<p>from sexual harassment and rape to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue education rather than be forced into early marriage • Unusual behaviour after an absence from school or college including depression, anxiety, aggression, withdrawn etc</p>	<p>not be explicit about the problem due to embarrassment or fear;</p> <ul style="list-style-type: none"> • Fear of changing for physical activities due to scars showing or bandages being visible
Gang and youth violence	<p>Gangs where crime and violence are a core part of their identity. It can lead to increased anti-social behaviour and youth offending</p>	<ul style="list-style-type: none"> • May have expensive items • Change in behaviour • Bruises/cuts • Social activities change • Gang tattoos • Carrying weapons
Private fostering	<p>Fostering arrangement without consent of local authority</p>	<ul style="list-style-type: none"> • Moving to different homes regularly • Not discussing family life • Abandonment characteristics
Female Genital Mutilation (FGM)	<p>Partial or total removal of female external genitalia or injury to another part of the female genitalia for non - medical reason</p>	<ul style="list-style-type: none"> • Spending a long time in the toilet • Uncomfortable sitting down • Long trips away from home
Gender based violence	<p>Violence (either physical or sexual) towards women/men</p>	<ul style="list-style-type: none"> • Withdrawn • Nervous • Physical signs of abuse
Radicalisation	<p>Process by which a person comes to support/partake in terrorism and extremism (also includes – political/animal rights and ecological extremist). Extremism is ideology that is considered to be far outside the acceptable mainstream attitudes of society. – include opposition to British values.</p>	<ul style="list-style-type: none"> • Long trips away from home • Talking about being wronged by a state or political system • Strong views about changing life • Talk of harming others in plight for cause
Sexting	<p>Exchange of self-generated sexually explicit images</p>	<ul style="list-style-type: none"> • Withdrawn • Boasting

	through mobile picture messages	<ul style="list-style-type: none"> • Hiding mobile phones
Teenage relationship abuse	Abuse in a relationship – either physical, sexual, emotional or financial	<ul style="list-style-type: none"> • Withdrawn • Constantly responding to messages/calls • Detect a control aspect • Physical signs of abuse
Trafficking and 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	<ul style="list-style-type: none"> • Talking about travelling abroad • Talking about someone else having control over them individuals into a life of abuse, servitude and inhumane treatment • Moving homes regularly • Avoid eye contact and appear frightened • No identification documents • Physical or emotional abuse
Mental health	Absence of psychological wellbeing and effective physical or psychological functioning	<ul style="list-style-type: none"> • Becoming more withdrawn • Changes in behaviour or personal appearance • Less punctual than normal, less interest
Children missing in education	Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.	<ul style="list-style-type: none"> • Not showing up for visits with no explanation • Not contactable • Neither lifetime nor employer can get hold of them or knows where they have gone
Sexual harassment and violence	Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of	<ul style="list-style-type: none"> • Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater

	<p>children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Sexual assault is intentional touching of a sexual nature, where the other party does not consent. When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.</p>	<p>risk Whilst not intended to be an exhaustive list, sexual harassment can include:</p> <ul style="list-style-type: none"> • sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; • Children being the victim of abuse or harassment may avoid social interaction, be withdrawn, be self-conscious, use sexualised language
County lines	Organised criminal distribution of drugs from the big cities to smaller towns and rural areas using children and vulnerable people. The main county	<ul style="list-style-type: none"> • Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;

	<p>line gangs operate from Liverpool and London, but other groups operate in Birmingham and Manchester. The influence is nationwide. These drug networks or gangs groom and exploit children and young people to carry drugs and money. N.B can still be exploitation even if the activity appears consensual</p>	<ul style="list-style-type: none"> • Can be perpetrated by individuals or groups, males or females, and young people or adults; and • is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.
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Appendix F - safeguarding disclosure recording form

Safeguarding disclosure recording form

Once completed please email the disclosure to safeguarding@mtstrainingltd.com

Your details

Name	
Position/ job role	
Relationship to the individual	
Contact number	
Contact email address	
Is the person/ people aware of the referral?	Yes/ No
Has anyone been consulted about this referral)?	Yes/No If yes, who?
Reported by	
Reported to	
Reported date	

Referral details

Name(s) of learner/ staff member	
DOB (if learner(s))	
Learner number	
Course the learner is on	
Their contact number	
Their email address	
Their home address	
Employer	
Place of work address	

Ethnicity (if known)	
Nationality (if known)	
Spoken languages	
Is English their first language?	Yes/ No

Concern/ disclosure details

Details:

Actions

Internal use only:

Appendix G – COVID-19 response arrangements

The below details additional measures and amended procedures put in place to safeguarding staff and learners during COVID 19.

Guidance taken from:<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-otherproviders/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers#role-of-the-localauthority>

<https://www.gov.uk/government/publications/coronavirus-covid-19-guidance-on-vulnerable-children-andyoung-people/coronavirus-covid-19-guidance-on-vulnerable-children-and-young-people>

- Learners with an EHCPs - Learner support team will review all plans and ensure the learners are safe to continue learning from home and if any further educational or pastoral measure need to be in place
- ASN learners and EHCP learners will be contacted by the trainers during this period and offered support avenues.
- A bespoke training programme has been put together for ASN and ECP learners to provide speciality support during the pandemic.
- An increase in remote visits has been supported with an employee code of conduct and additional training. The code of conduct is also reinforced with learners

- Additional information and support material have been added to Bud to ensure learners have access to pastoral and government support and guidance during this time
- The automatic response for the safeguarding email address was amended to include government guidance for COVID -19
- Local partnership arrangements/ Prevent FE coordinators and emergency services will remain as the point of contact for any safeguarding cases requiring referral •
- Employees that were recruited during the COVID 19 restrictions. The recruitment process and on-boarding of new employees is being completed remotely.