

Apprenticeship Policy

Safeguarding and Prevent Duty Policy

MTD Training



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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:

- 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 2018' the statutory guidance.
- 'Keeping Children Safe in Education or Working Together to Safeguard Children (2018)' and the Local Safeguarding Children Board (LSCB) procedures.

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

SCOPE

This policy and its procedures will apply to:

- The Senior Leadership Team
- Employees of MTD
- Learners
- 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.

COMMUNICATION AND DISSEMINATION OF 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.

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.

All staff have read and confirmed their understanding of the Keeping Children Safe in Education 2018.

SAFER RECRUITMENT AND 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 complies 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 to include a robust introduction into the safeguarding and prevent policy and procedures. This includes mandatory reading of internal and external policies and e-learning modules.

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.

SAFEGUARDING ACTIONS MAY BE NEEDED TO PROTECT LEARNERS FROM THE FOLLOWING:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect
- Bullying including cyberbullying
- Child missing from education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence

- Gender-based violence / violence against women and girls (VAWG)
- Mental health
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Sexting
- Trafficking
- Sexual Violence
- Sexual Harassment

Staff need to have an awareness of the different types of safeguarding issues and explanations and definitions. Staff should also be aware that behaviours linked to, for example, drug taking, alcohol; abuse, truanting and sexting also put learners in danger.

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 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.
- 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

- If MTD staff have concerns about a learner:
- If staff members have any concerns about a learner, this must be referred 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.

IF A LEARNER MAKES A DISCLOSURE TO A MEMBER OF STAFF

- If a learner makes a disclosure to a member of staff, the learner should be acknowledged, taken seriously and listened to.
- 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.

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).

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.

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.

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.

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
- 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 ensure compliance with the Prevent duty, all 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.
- Exemplify British/Community Values into their work and practice and that opportunities in the curriculum are used to promote these values to learners.

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 AND RESPONDING TO EVENTS

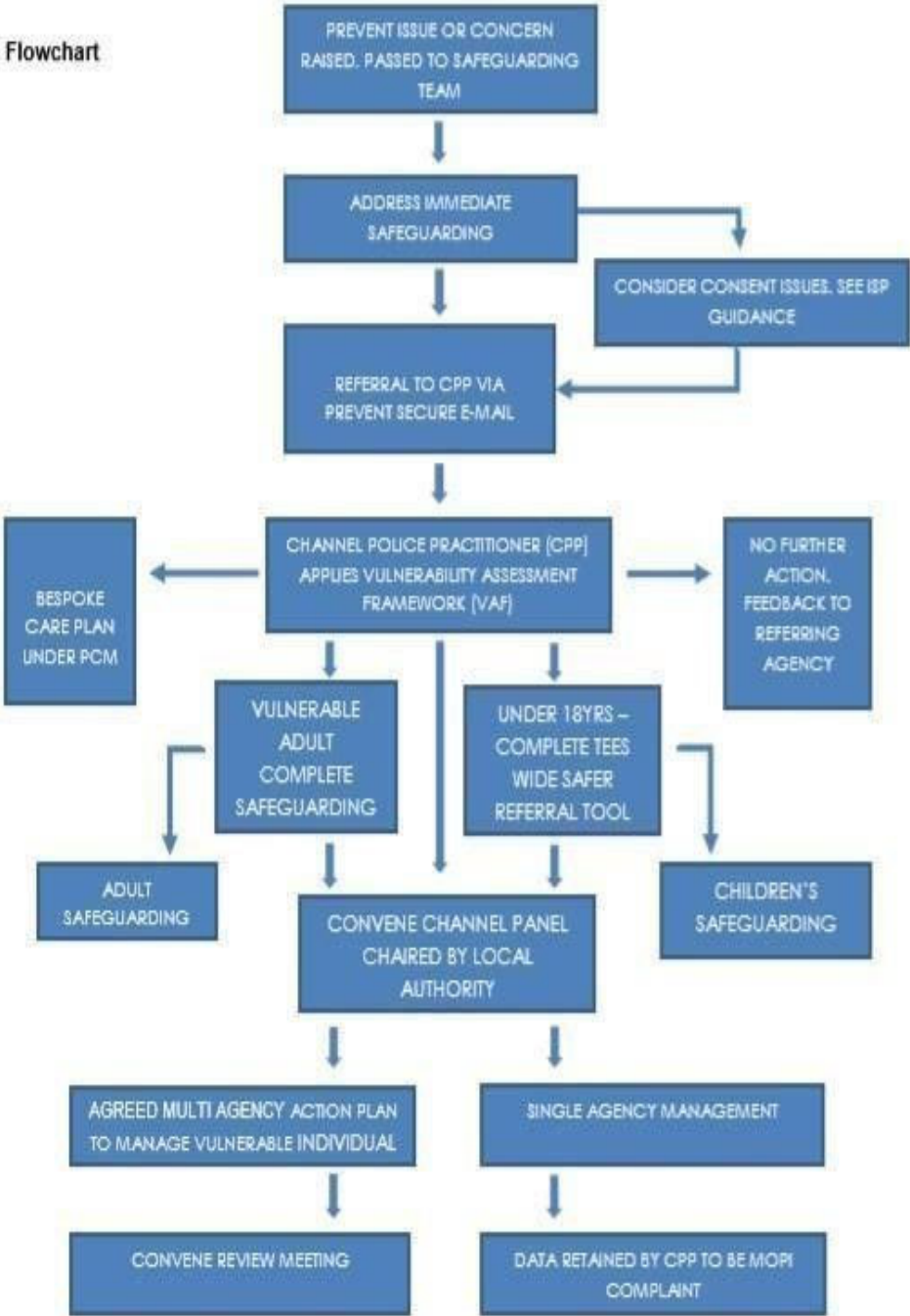
Embedding values within the provision

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

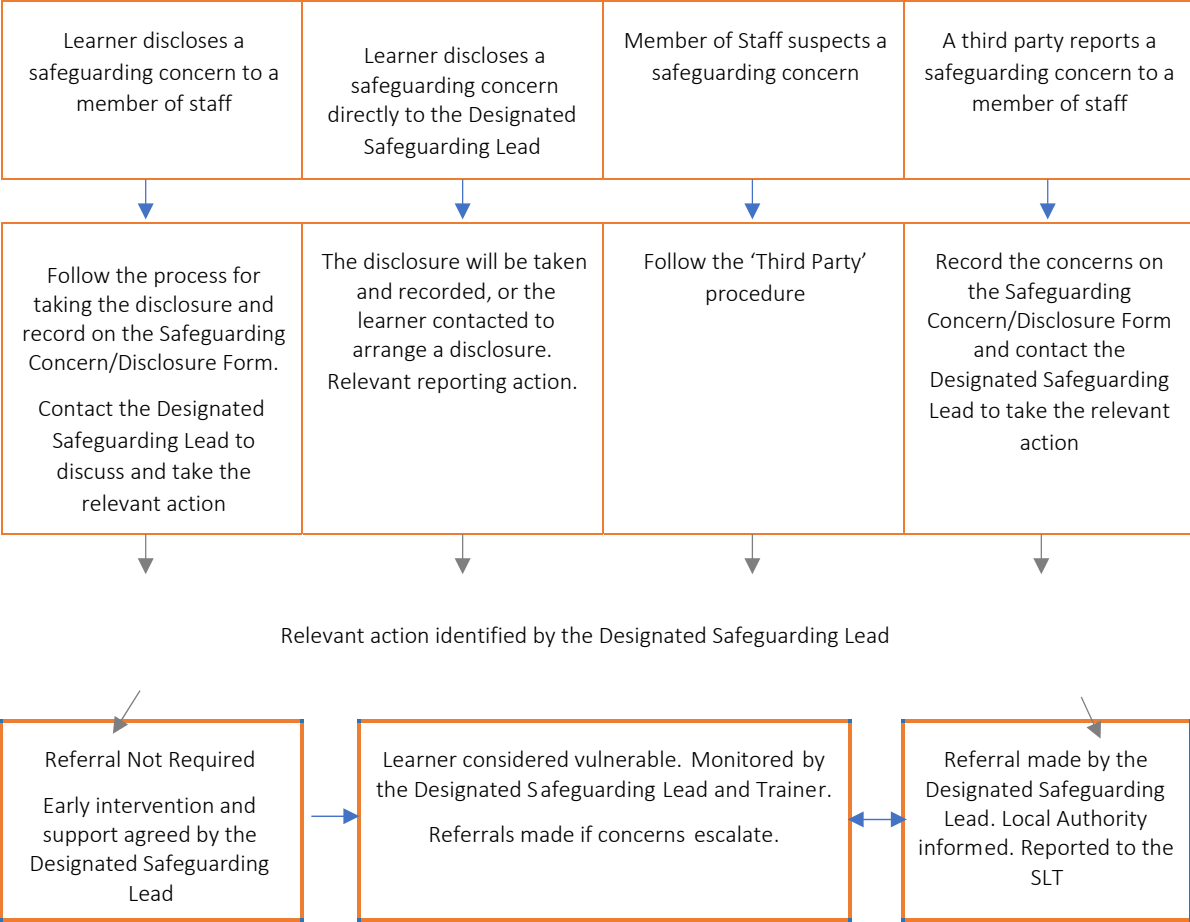
The Designated Safeguarding Lead, will have overall responsibility for the coordination of Prevent activity.

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
APPENDIX A

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