Management Training and Development Limited

(t/a MTD Training)

Apprenticeship Safeguarding & Prevent Duty Policy

Policy Owner		Position			
Sean McPheat		Chief Executive Officer			
Review History					
V1	Approved		January 2021	Review	March 2022
V2	• Addition of more detail of how the policy is promoted to apprentices, staff and employers. (page 3) • Addition of detail in Safe Recruitment and Training OF Staff (page 4) • Addition of more detail re. "5Rs" (page 10) • Addition of extra detail of types of abuse. (page 5-8) • Addition of detail in making /responding to a disclosure. (Page 8-9) • Addition of support available to apprentices (Page 11) • Addition of monitoring of IT usage. (Page) • Addition of detail in action that MTD will take to protect apprentices from radicalisation. (Page 17)		March 2022	Review	March 2023
V3	• Update applicable safeguarding and prevent legislation references. (P3)		June 2023		September 2023
V4	• Updated to reference adherence to Keeping Children safe in Education 2023		September 2023		September 2024
V5	• Updated legislation and principles that influence this policy		September 2024		September 2025

		Safeguarding referral form updated (Appendix A) • Body image added (Appendix B) • Appendix C updated				
V6		• Updated legislation and principles that influence this policy including: Keeping Children safe in Education 2025 and The Online Safety Act 2023	September 2025		September 2026	

Policy Purpose

The purpose of this policy is to demonstrate the commitment of MTD to safeguarding adults and to ensure that everyone involved in MTD is aware of the legislation, policy and procedures for safeguarding adults, their role and responsibility for safeguarding adults, what to do or who to speak to if they have a concern relating to the welfare of wellbeing of an adult within the organisation.

Management Training & Development Limited (MTD) are fully committed to safeguarding the welfare of our learners. MTD is committed to creating a culture of zero-tolerance of harm to adults which necessitates: the recognition of adults who may be at risk and the circumstances which may increase risk; knowing how adult abuse, exploitation or neglect manifests itself; and being willing to report safeguarding concerns. This extends to recognising and reporting harm experienced anywhere, including within our activities, within other organised community or voluntary activities, in the community, in the person's own home and in any care setting.

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. We will safeguard adults by ensuring that our activities are delivered in a way which keeps all adults safe.

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.

Legislation/Safeguarding Guidance

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 (including Guidance – key documents for the DSL) has been developed in accordance with the principles established by the:

- The Department for Education's (DfE) 'Keeping Children Safe in Education' (September 2025) https://assets.publishing.service.gov.uk/media/68add931969253904d155860/Keeping_children_safe_in_education_from_1_September_2025.pdf
- The Online Safety Act 2023 https://www.legislation.gov.uk/ukpga/2023/50/contents https://www.gov.uk/government/publications/online-safety-act-explainer/online-safety-act-explainer
- The statutory guidance 'Working together to safeguard children', (HM Government July 2018 updated Dec 2023) https://assets.publishing.service.gov.uk/media/6849a7b67cba25f610c7db3f/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf
- Children Acts 1989 and 2004 https://www.legislation.gov.uk/ukpga/2004/31/contents
- The Education Act 2011, and in line with the government publication https://www.legislation.gov.uk/ukpga/2011/21/contents
- The Care Act https://www.legislation.gov.uk/ukpga/2014/23/contents
- Mental Capacity Act; Safeguarding Vulnerable Groups Act 2006; and the key principles of safeguarding referencing making safeguarding personal and the wellbeing principle. Other wider legislation includes Equality Act 2010, Date Protection Act 2018, Public Interest Disclosure Act 2018.
- Safeguarding Children Board (LSCB) procedures.
- Worker Protection (Amendment of Equality Act 2010) Act 2023 https://www.legislation.gov.uk/ukpga/2023/51

- Prevent duty guidance: for Further education institutions in England and Wales: (HM Government 2015 – Updated March 2024) https://www.gov.uk/government/publications/prevent-duty-guidance/prevent-duty-guidance-for-england-and-wales-accessible
- Further Education and Skills Inspection handbook (Published 14th May 2019, last updated 9th September 2024) https://www.gov.uk/government/publications/further-education-and-skills-inspection-handbook-eif
- Inspecting safeguarding in early years, education and skills settings (September 2019) https://www.gov.uk/government/publications/education-inspection-framework/education-inspection-framework-for-use-from-november-2025

All staff should ensure that they have read and understood the associated policies listed on pages 4 and 5, to support the effective implementation of the safeguarding policy and procedures.

Scope of Policy

MTD'S Chief Operating Officer holds overall responsibility for this policy, and its procedures will apply to:

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

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

Definitions

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

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

Vulnerable Adults - In terms of this policy, a vulnerable adult is defined as a person aged 18 years or over and who is or may need 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 (2023)' 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.

Implementation

Communicating & Promoting the Policy

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

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

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

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

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

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

Safeguarding actions may be needed to protect learners from the following:
- Physical abuse
- Emotional abuse
- Sexual abuse
- Child missing from education
- Child missing from home or care
- Gender-based violence / violence against women and girls (VAWG)
- Mental health
- Private fostering
- Female genital mutilation (FGM)
- Relationship abuse
- Sexting
- Forced marriage
- Sexual harassment

Safer Recruitment & Training for Staff

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

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

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

Recognition of Abuse, including Neglect, Bullying and Cyber Bullying

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

MTD staff will remain vigilant for early signs of the different types of abuse. Also, Staff need to have an awareness of the different types of safeguarding issues and explanations and definitions. (See Appendix C)

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

Looked After Children

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

Learners With Special Educational Needs & Disabilities

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability without further exploration.
- Learners with SEN and disabilities can be disproportionally 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:

    o Health and Safety Policy
    o Safer Recruitment Policy and Guidelines
    o Learner Behaviour Policy
    o External Speakers and Events Policy

Procedure For Staff

Disclosures

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

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

During the disclosure

- As soon as it becomes clear that the learner is talking about a safeguarding issue, you need to gently stop them and inform them that you have a legal obligation to pass this information on to a Designated Safeguarding Lead (DSL). 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 DSL immediately to explain the situation and pass on the written notes. The DSL will outline the action that s/he has to take so that you can explain this to the learner. It may be appropriate for the DSL to meet the learner. You must not take any further action yourself. This includes contacting parents/carers or outside agencies. The DSL will be required to report a referral immediately to the local safeguarding authority.

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

- Refer any concerns about a learner, to the Designated Safeguarding Lead, to agree a course of action. Options can include referral to specialist services or early help services.

- MTD recognises its role in identifying learners who may benefit from early help and providing support as soon as a problem emerges in a learner's life. Providing early help is more effective in promoting the welfare of young people than reacting later. Staff may be required to support other agencies and professionals in an early help assessment and share information support early identification and assessment. The DSL will be required to report a referral immediately to the local safeguarding authority.

- If early help is appropriate, the Safeguarding Lead will support the staff member to liaise with external agencies. The learner should then be monitored and if the situation does not appear to be improving, a referral will be made by the DSL 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 DSL immediately who will refer to the regional Prevent Coordinator for advice and guidance.

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

The 5R's
Recognise - One of the most important roles for any employee is to be able to recognise abuse or neglect in the course of their everyday work. Sometimes, the signs are obvious such as broken bones or cuts and bruises. However, sometimes the signs are a lot less easy to identify.

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

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

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

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

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

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

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

Local Authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.
Parents and carers have the right to be informed in respect of any concerns or any action taken to safeguard and promote their welfare, providing this does not compromise the learner's safety - Keeping Children Safe in Education (2018).

Support Available for Our Apprentices

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

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

External Support & Help Lines.

Anti-Bullying help lines and organisation help lines:

Childline Phone: 0800 1111

NSCPCC Phone: 0808 800 5000

Family Links Phone: 0808 800 2222

Respect Me – 0344 800 8600 (Scotland)

Organisations/ websites:

NHS Safeguarding Referrals: https://safeguarding-guide.nhs.uk/

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

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

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

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

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

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

Allegations Of Abuse Made Against Other Young People

Staff must recognise that young people can abuse 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) i.e. under the age of 18 years, vulnerable adult(s) on other young person(s) or 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. Such concerns should be raised in the same way as any other concerns, directly to their trainer or to the DSL.

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

Visitors are asked to wait in reception until they are collected by a member of staff and will be escorted throughout their visit 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.

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. MTD operates a "cameras on" policy for online meetings with apprentices.

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. Consequently, 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 the DSL prior 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 Chief Operating Officer, 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 MTD's safeguarding practices and that such concerns would be taken seriously by the Senior 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 Senior 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 (SLT) 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 consider 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. S/he 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 (CEO)

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

- Safeguarding policies and procedures and any linked Safeguarding polices 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.
- Policies and 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 know referrals about suspected abuse or neglect may be made and the role MTD has 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 and employers.

- Ensures the Safeguarding Team offer advice, assess information promptly, take action on, 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.

Monitoring IT Usage/E-Safety

MTD are committed to keeping all apprentices and staff safe while online. Learners are given access to several online applications e.g.
- BUD- online portfolio
- BKSB- Maths and English portal

Training is given to apprentices in the safe and effective use off the applications and each application has its own terms, conditions and privacy policies.

MTD may signpost learners to external websites and part of agreed training activities. MTD makes every effort to ensure that these external links are safe. Learners are also provided with a link to a short awareness cyber security video embedded within all learning resource.
VIDEO: Cybersecurity - How to Stay Safe Online? https://youtu.be/xS5tWwX9ME4?si=IvV-mEuJTQeQSqji

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

IT Security

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

- Any breach of the IT Security Policy will be dealt with under our Disciplinary Procedure, with a sanction up to and including Gross Misconduct (or termination of engagement), we may withdraw your Internet and/or email access.

- You must not interfere with the work of others or the system itself. The facilities must be used in a responsible manner

- Please refer to section 8 of the MTD Staff Handbook (IT Security policy) for a full list of prohibited activities and further guidance when in use of company IT facilities.

- Monitoring may include internet usage at the workplace, internet usage outside the workplace during working hours using Company systems or network, and internet usage using hand-held or portable electronic devices. MTD may also monitor internal emails.

Prevent Duty

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

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

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

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

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

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

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

What Is Channel?
Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk from radicalisation using collaboration between local authorities, statutory partners, the police and local community to:
- Identify individuals at risk of being drawn into terrorism
- Assess the nature and extent of that risk
- Develop the most appropriate support plan for the individual concerned

The following indicators identify factors that may suggest a young person, or their family may be vulnerable to being drawn into extremism:
- Identity crisis - distance from culture religious heritage and uncomfortable with their place in the society around them.
- Personal crisis - family tensions, sense of isolation, adolescence low self-esteem, disassociation from existing friendship groups and becoming involved with a new and
- different group of friends searching for answers to questions about identity, faith and belonging.
- Personal circumstances - migration, local community tensions, events affecting Country and region of origin, alienation from UK values having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy, unmet aspirations, perceptions of injustice feeling of failure, rejection of civic life, criminality, experiences of imprisonment, poor resettlement, reintegration, previous involvement with criminal groups.

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

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

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

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

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

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

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

Aims of the Prevent Policy

This policy has the following aims:

- To promote and reinforce a set of shared values, founded on tolerance and respect for others.
- To create a safe space for free and open debate.
- To promote a sense of community cohesion.
- To ensure that learners are safe and that we create an environment that is free from bullying, harassment and discrimination.
- To support learners who may be at risk from radicalisation and to be able to signpost them to further external sources of support where appropriate.
- To ensure that staff are aware of their responsibilities under this policy and are able to recognise and respond to vulnerable learners.

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

British Values

Defining British Values

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

 "Democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different backgrounds, characteristics, beliefs and faiths"

Managing Risks & Responding to Events

***Embedding values within the provision***

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

Coordination and overall responsibilities

The Designated Safeguarding Lead will have overall responsibility for the coordination of Prevent activity.
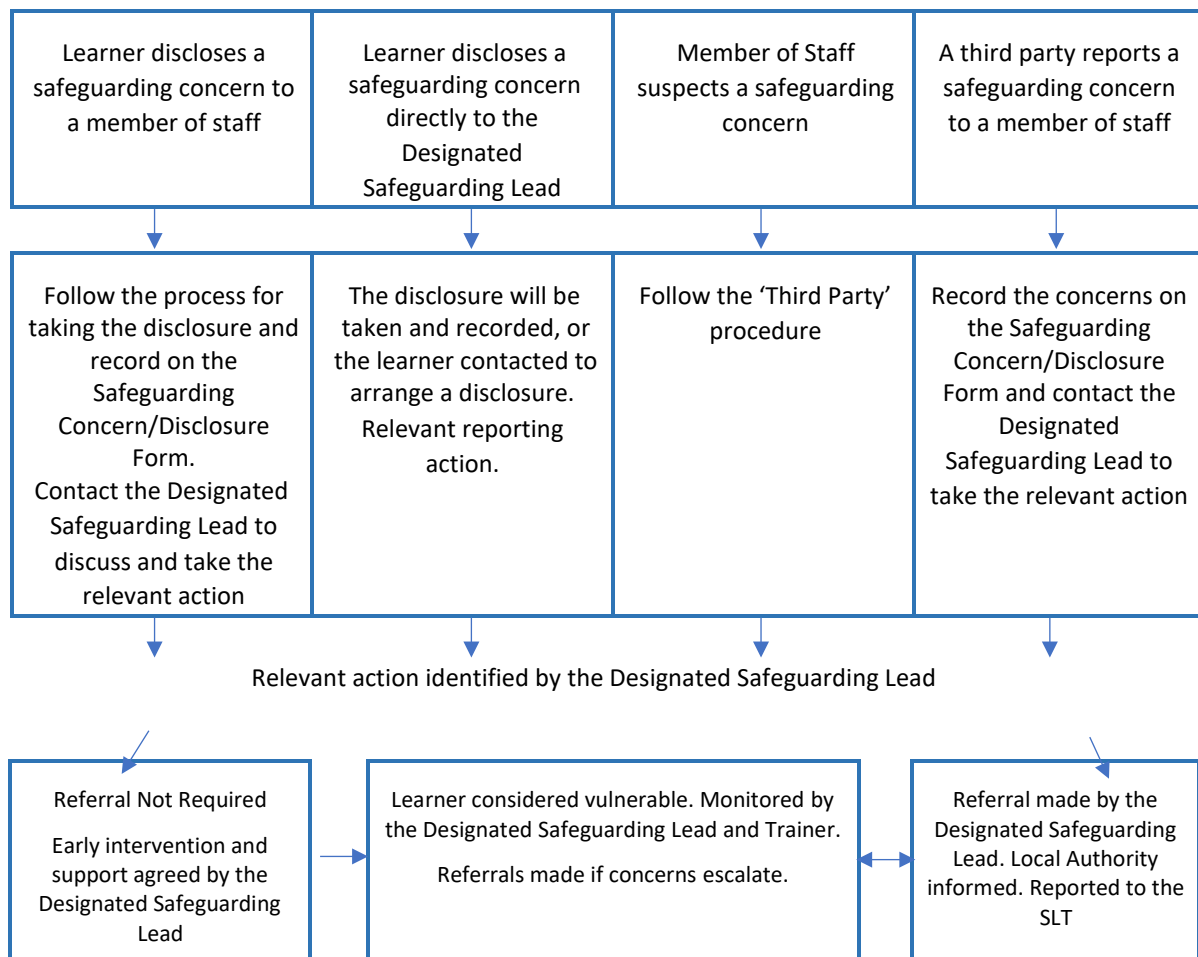
The Official Referral Process for Prevent – Training Providers

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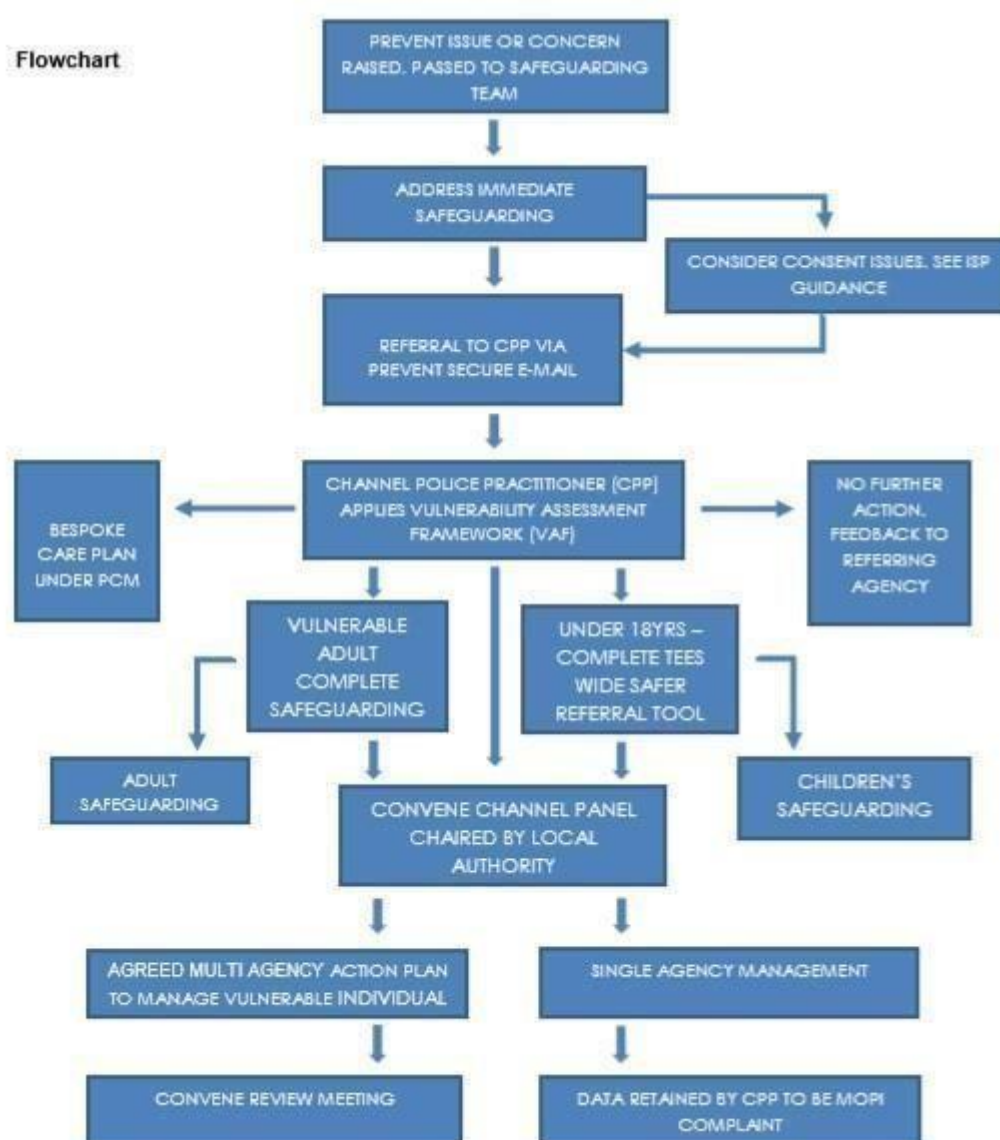
CPP - Channel Police Practitioner
CPP - Channel Police Practitioner
PCM - Primary Care Manager

Safeguarding Learners Procedure Flow Diagram

Learner discloses a safeguarding concern to a member of staff	Learner discloses a safeguarding concern directly to the Designated Safeguarding Lead	Member of Staff suspects a safeguarding concern	A third party reports a safeguarding concern to a member of staff
Follow the process for taking the disclosure and record on the Safeguarding Concern/Disclosure Form. Contact the Designated Safeguarding Lead to discuss and take the relevant action	The disclosure will be taken and recorded, or the learner contacted to arrange a disclosure. Relevant reporting action.	Follow the 'Third Party' procedure	Record the concerns on the Safeguarding Concern/Disclosure Form and contact the Designated Safeguarding Lead to take the relevant action

Relevant action identified by the Designated Safeguarding Lead

Referral Not Required\n\nEarly intervention and support agreed by the Designated Safeguarding Lead	Learner considered vulnerable. Monitored by the Designated Safeguarding Lead and Trainer.\n\nReferrals made if concerns escalate.	Referral made by the Designated Safeguarding Lead. Local Authority informed. Reported to the SLT

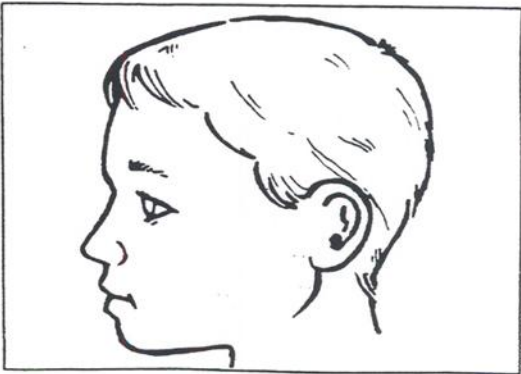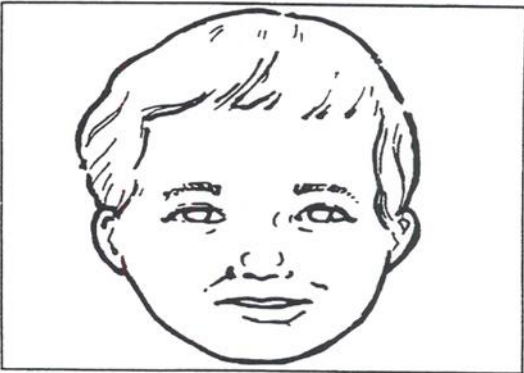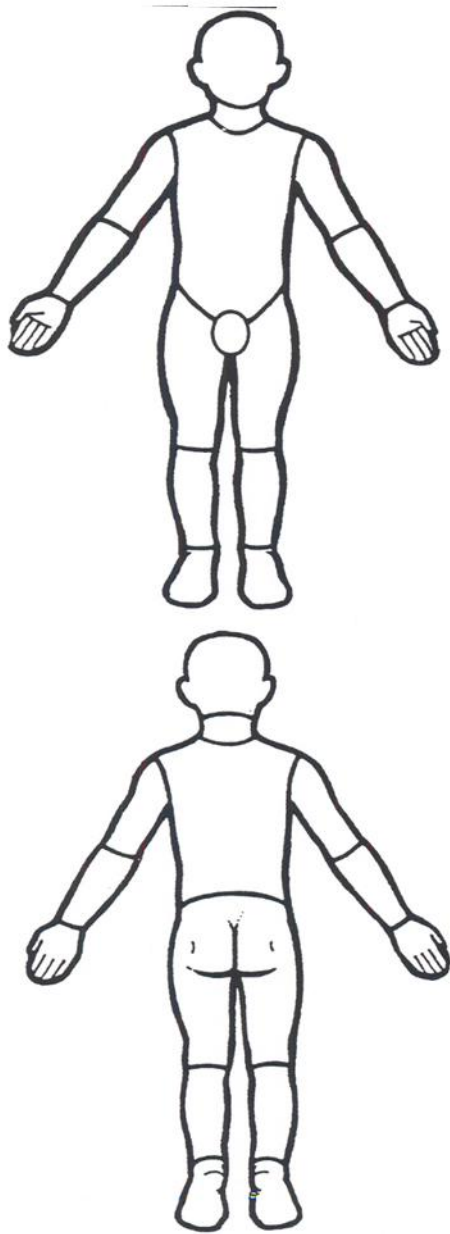## Appendix A - Safeguarding Concern/Disclosure Form

Staff, contractors and others associated with MTD Training, are required to complete this form and pass it to Designated Safeguarding Lead if they have a safeguarding concern about a child, young person or vulnerable adult receiving services or support from MTD Training.

Information Required	Enter Information Here
Full name of Person of Concern	
Your name and position in MTD Training	
Nature of concern/disclosure *Please include where you were when the disclosure was made, what you saw, who else was there, what did the discloser say or do and what you said.* *[Ensure that if there is an injury this is recorded (size and shape) and a body map is completed]* *[Make it clear if you have a raised a concern about a similar issue previously]*	
Time & date of incident:	
Name and position of the person you are passing this information to	
Your Signature	
Time and date form completed	
Date and time form received by DSL	
Action Taken by DSL	
Feedback given to person who recorded disclosure [yes/no/details, date and time]	
Further Action Agreed	
Full Name of DSL	
Signature of DSL	
Date of DSL Signature	

Appendix B

Body Map

Appendix C - Definitions

The following definitions have been taken from Keeping Children Safe in Education (KCSI) and the supplementary guidance contained within KCSI.

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by on definition or label. In most cases multiple issues will overlap with one another.

Abuse
Abuse may be physical, sexual, emotional abuse, or neglect. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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

Physical Abuse
Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. It includes actual or likely physical injury to a learner, or failure to prevent injury. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. This form of physical harm is recognised as Fabricated or Induced Illness. Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by on definition or label. In most cases multiple issues will overlap with one another.

Emotional Abuse
Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual Abuse
Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. It also includes actual or likely sexual exploitation of a learner, including prostitution.

Neglect
Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Peer-on-peer abuse

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

Risks/ abuse related to family/cultural belief/ faith

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

Specific Safeguarding Issues

Bullying and Harassment

Bullying can include a variety of behaviours from one individual/ group to another individual/ group such as name calling, offensive language, coercion, hitting, pushing, theft or damage to belongings, cyber, spreading harmful messages, hate crime or mate crime which is befriending someone with the intent to exploit them in some way. Under the Children Act 1989, a bullying incident should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. Where this is the case, MTD staff should report their concerns to a member of the Safeguarding Team. Even where safeguarding is not considered to be an issue, MTD may need to draw on a range of external services to support the learner who is experiencing bullying, or to tackle any underlying issue which has contributed to a learner engaging in bullying.

Cyber Bullying and E-Safety

Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences. Stopping violence and ensuring immediate physical safety is obviously the MTD's priority but staff need to be aware that emotional bullying can be more damaging than physical. Many experts say that bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online. The safe and responsible use of technology is sometimes presented as primarily a learner protection issue, but all need support to keep themselves safe online. The risks associated with the use of technology are vast and include internet, text or video messaging, email, chatrooms, social media networking sites, etc. used to embarrass, humiliate, threaten, intimidate, or bully an individual to gain power and control over them. Other risks include the mismanagement of personal data, risks of financial scams, identity theft, grooming and radicalisation.

Missing from Education

A young person going missing from education is a potential indicator of abuse or neglect. MTD staff should follow the MTD's procedures for dealing with learners that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. Any concerns should be referred to a member of the Safeguarding Team.

Looked after Child

A child who is looked after by a local authority by reason of a care order or being accommodated under section 20 of the Children Act 1989.

Care Leaver

An eligible, relevant or former relevant child as defined by the Children Act 1989.

Child Sexual Exploitation (CSE)

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they're in a loving, consensual relationship. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Signs and Symptoms of CSE: go missing from home, care or education, be involved in abusive relationships, intimidated and fearful of certain people or situations, hang out with groups of older people, or antisocial groups, or with other vulnerable peers, associate with other young people involved in sexual exploitation, get involved in gangs, gang fights, gang membership, have older boyfriends or girlfriends, spend time at places of concern, such as hotels or known brothels, not know where they are, because they have been moved around the country, be involved in petty crime such as shoplifting, have unexplained physical

injuries, have a changed physical appearance, for example lost weight.

Faith Abuse

Faith abuse is child abuse linked to faith or belief. This includes: belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or muti murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in

magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home.

Domestic Violence

The definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: Psychological, Physical, Sexual, Financial and Emotional.

Drugs

This includes alcohol, tobacco, illegal drugs, medicines, new psychoactive substances ('legal highs') and volatile substances.

Fabricated or Induced Illness

There are three main ways of the parent / carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- Fabrication of signs and symptoms which may include fabrication of past medical history
- Fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids.
- This may include falsification of letters and documents.
- Induction of illness by a variety of means

Honour Based Violence (HBV)

So-called 'honour-based violence' encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital

Mutilation (FGM) forced marriage and practices such as breast ironing. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts, staff should speak to one of the Safeguarding Team.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Although the age of learners at MTD is such that they are not necessarily in the high-risk category for FGM, a learner may disclose that she is at risk of FGM, has suffered FGM or that a sister or family member is at risk. MTD staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. The new mandatory reporting duty for FGM, introduced via the Serious Crime Act 2015, came into effect on 31 October 2015. This duty requires MTD to report known cases of FGM in under 18-year-olds to the police. Victims of FGM are likely to come from a community that is known to practice FGM.

Signs and Symptoms of FGM: a long holiday abroad or going 'home' to visit family. A relative or cutter visiting from abroad, a special occasion or ceremony to 'become a woman' or get ready for marriage, a female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family).

Forced Marriage and link to Financial Abuse

Taking wages or not giving money can also be a factor in forced marriage. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture to coerce a person into marriage. An arranged marriage is not the same as a forced marriage. In an arranged marriage, the families take a leading role in choosing the marriage partner, but both parties are free to choose whether to enter into the marriage or not.

Gangs and Youth Violence

Groups of children and young people often gather in public places to socialise, and peer association is an essential feature of most children's transition to adulthood. Groups of children and young people can be disorderly and/or anti-social without engaging in criminal activity. Young people on the periphery of becoming involved with street gangs and those young people already involved in some way can be described as 'A relatively durable, predominantly street based group of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity'.

Youth Violence

Youth violence, serious or otherwise, may be a function of gang activity. However, it could equally represent the behaviour of a child acting individually in response to his or her particular history and/or circumstances. 'Serious youth violence' is defined as 'any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19', i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences. Most children and young people do not become violent overnight. Their behaviour represents many years of (increasingly) anti-social and aggressive acts.

Mental Health

Mental health problems can include depression, anxiety, eating disorders, self-harm, suicidal tendencies and the potential risk of harming others.

Youth Produced Sexual Imagery (Sexting)

This is when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics' or 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. Once the image is taken and sent, the sender has lost control of the image, and the image could end up anywhere.

Making, possessing and distributing an imagery of someone under 18 which is indecent is illegal. This includes imagery created by under 18s themselves. The relevant legislation is contained in the Protection of Children Act 2004 (England and Wales) as amended in the

Sexual Offences Act 2003 (England and Wales). Specifically, it is an offence to possess, distribute, show and make images of children. The Sexual Offences Act 2003 defines a child, for the purposes of indecent images, as anyone under the age of 18. The latest guidance from the UK Council for Child Internet Safety (UKCCIS) introduces the phrase 'youth produced sexual imagery' instead of 'sexting'. (August 2016). This guidance refers to sexual imagery and not indecent imagery as indecent is subjective and has no specific

definition in law. The type of incidents covered by this guidance are:

- A person under the age of 18 creates and shares sexual images of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18
- The sharing of sexual imagery of people under 18 by adults constitutes child sexual abuse and this should be reported to the police.

Handling Sexual Imagery Incidents

- All incidents involving youth produced sexual imagery should be reported to the Safeguarding Team.
- An initial review meeting will be held and subsequent interviews with the young people involved, if appropriate.
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in this process if there is a concern that a young person has been harmed or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

An immediate referral to the police and/or children's social care will be made at this initial stage if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent, for example due to a learning difficulty.
- What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's development age or are violent.
  - The imagery involves sexual acts and any child in the imagery is under 13.
  - There is reason to believe that a young person is at risk of harm owing to the sharing of imagery, for example, the young person is presenting as suicidal or self-harming.

If none of the above apply MTD may decide to respond to the incident without involving the police or children's social care. Although the sharing of sexual imagery is illegal, the National Police Chief's Council (NPCC) is clear that 'youth produced sexual imagery should be primarily treated as safeguarding issue' and the law was also created to protect children and young people and not to criminalise them. The decision to respond to the incident without involving the police or children's social care will be made when the Designated safeguarding Lead is confident that there is enough information to assess the risks to the young

people involved and that the risks can be managed within the MTD's learner coaching policy.

Emotional abuse

Emotional abuse can include constant insults and name calling, isolation from friends and family, controlling what someone wears / where they go, checking up on someone all the time (checking emails, texts, social networking sites etc) and making someone feel responsible for the abuse.

Physical abuse

Physical abuse can include hitting, punching, pushing, biting, kicking, using weapons etc.

Sexual abuse

Sexual abuse can include unwanted kissing or touching, forcing someone to have sex, being made to watch pornography against their will and pressure not to use contraception.

Financial abuse

Financial abuse can include the taking and controlling of money, forcing someone to buy things for someone, forcing someone to work or not to work.

Trafficking

Human trafficking is defined as 'the recruitment, transportation, transfer, harbouring or receipt of children by means of threat, force or coercion for the purpose of sexual or commercial sexual exploitation or domestic servitude' (NSPCC). The Palermo Protocol establishes children as a special case for whom there are only two components - movement and exploitation. Any child transported for exploitative reasons is considered
to be a trafficking victim - whether or not he/she has been deceived, because it is not considered possible for children to give informed consent. A child may be trafficked without crossing any national borders, e.g. only within the UK. A child may be trafficked between several countries prior to being trafficked into/within the UK. The child may have entered the UK illegally or legally (i.e. with immigration documents). The intention to exploit the child underpins the entire process. The Modern Slavery Act 2015 consolidates current offences of trafficking and slavery and details the different forms of exploitation that a victim of trafficking may be forced into. The exploitation can take place in several ways including:

- Sexual Exploitation
- Labour Exploitation
- Criminal Exploitation
- Domestic Servitude
- Organ Harvesting

Distinction between human trafficking and smuggling

Human trafficking does not include people smuggling, which requires the consent of the person being moved. A smuggled person is, however, a potential victim who may be vulnerable to being trafficked at any point in their journey, and the distinction can be blurred. Perpetrators may smuggle people with the intention of exploiting them, or with the intention of facilitating exploitation. Alternatively, the smuggled can become vulnerable to traffickers upon arrival at their destination and subsequently be exploited and/or harmed.

Modern slavery

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

Physical abuse

Physical abuse can include hitting, punching, pushing, biting, kicking, using weapons etc.

Emotional abuse

Emotional abuse can include constant insults and name calling, isolation from friends and family, controlling what someone wears, where they go, who they go with, checking up on someone all the time (checking emails, texts, social networking sites etc) and making someone feel responsible for the abuse.

- Labour Exploitation
- Criminal Exploitation
- Organ Harvesting
- Domestic Servitude

Financial or Material Abuse

This can include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse, misappropriation of property, possessions or benefits.

Incels

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

Risk to self and/or others

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

Serious Crime

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

Sexual violence and sexual harassment between learners

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

Initiation/Hazing

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

Upskirting

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

Online Safeguarding Issues

It is essential that learners are safeguarded from potentially harmful and inappropriate online material. An effective approach to online safety empowers a provider to protect and educate learners and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.

contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your learners or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).