

Mode Training Ltd

www.modetraining.co.uk



Safeguarding Policy

Copies of all Mode Policies and procedures can be obtained in large print. Please call 0151 709 4640 to request a large print copy or alternatively e-mail admin@modetraining.co.uk

To be read and understood by staff, learners, work experience providers, school mentors and all relevant partners.

Section 1

Statement of Intent

1. Director responsible for safeguarding
2. Designated Safeguarding Lead
3. Deputy Designated Safeguarding Lead
4. Policies and documents to also be read
5. Regulations applicable

Section 2

Main aims of the policy

1. Recruitment and training of staff and partners
2. Disclosure and Barring Service Criminal Record Checks
 - a. Individuals who have lived or worked outside the UK
 - b. Children and Young People Missing from Education

Roles and responsibilities

1. Role of Safeguarding Director
2. Role of Safeguarding Lead and Deputy Leads
3. Role of staff and volunteers
4. Good practice for staff
5. Rules and regulations for staff

What is abuse?

1. Physical
2. Emotional
3. Sexual
4. Neglect
5. Domestic Violence
6. Discriminatory Abuse
7. Child Sexual Exploitation (CSE)
8. Forced Marriage
9. Honor Based Violence
 - a. Once Chance Rule
10. Female Genital Manipulation (FGM)
11. Bullying
 - a. Peer on Peer abuse
 - b. Sexting

Section 3

Procedures for responding to neglect

1. A child, young person or vulnerable adult alleges abuse
2. A third party reports a child, young person or vulnerable adult is being abused
3. There are signs and indicators which point to abuse

Section 4

Monitoring and Evaluation

Appendix 1

- Preventing extremism and radicalisation

Appendix 2

- Female Genital Mutilation

Appendix 3

- Receiving an allegation about a member of staff

Appendix 4

- Modern Slavery Human Trafficking

Appendix 5

- Visitor arrangements

Section 5

Useful Contacts

Section 1

A Statement of Intent

Mode Training Limited (MTL) is fully committed to providing and maintaining safe and secure working conditions for all our staff and learner/students. We are also committed where appropriate to providing information, training and supervision in relation to safeguarding including tackling extremism. MTL recognises its responsibility to take all reasonable steps to promote safe practice and to protect children, young people and vulnerable adults from harm, abuse, exploitation and extremist views and that scrutiny, challenge and supervision are key to safeguarding children and vulnerable adults.

This policy is reviewed annually to make transparent the core principles by which MTL intends to conduct business, the standard of learning we intend to deliver and to publicly communicate the levels of responsibility of MTL, and the employers where learner/students are employed or placed. The contents of this policy are the ultimate responsibility of Debbie Tagoe – Director

Throughout this policy reference will be made to “children and young people”. This means “those under the age of 18 years”. Reference will also be made to “vulnerable adults”. This means anyone over the age of 18 who is at risk of or susceptible to harm due to their vulnerability. (English may not be their first or chosen language, an adult with a physical or learning disability, an adult from an ethnic minority background, an adult who is new to the area and or environment. This list is not exhaustive it is merely meant as a guide)

This policy should be used as a guide for MTL staff, learner/student’s, employer’s, work experience providers, school mentors, parents and guardians. It should also be issued to anyone who is delivering sessions to Mode learner/students.

Director responsible for safeguarding at Mode is:

Debbie Tagoe debbie@modetraining.co.uk 0151 709 4640

Designated Safeguarding lead (DSL) is:

Emma Sinnett emma@modetraining.co.uk 0151 709 4640

If the incident involves company director or member of her family the following DSL should be contacted immediately

Debbie Pearson dpearson@modetraining.co.uk 0151 709 4640

Deputy Designated Safeguarding Lead is:

Amanda Clarke amanda@modetraining.co.uk 0151 709 4640

The following documents and policies should also be read and understood:

- Health safety and welfare policy
- Safe use of ICT policy
- Disciplinary and grievance policy
- Behaviour and attendance policy
- Safer recruitment policy

- Staff code of conduct
- Whistle blowing policy
- Equality Diversity and Inclusion policy
- Disability statement
- Staff handbook

MTL will comply with all applicable regulations set out in:

- The Protection of Children's Act 1999
- The Safeguarding Vulnerable Groups Act 2006
- The Children's Act 2004
- The Education Act 2002
- The Sexual Offences Act 2003
- The Protection of Freedoms Act 2012
- Keeping Children Safe in Education 2018
- Working together to safeguard children 2018
- What to do if you are worried a child is being abused 2015
- The Counter-Terrorism & Security Act 2015
- Prevent duty guidance 2015
- Definition of CSE for practitioners 2017
- Monthly safeguarding updates issued by Director
- Liverpool Safeguarding Children Board LSCB

Section 2

Policy Aims

The main aims of the policy are:

- To ensure effective working relationships with other agencies to provide early help for children/vulnerable adults before they become at risk of harm or require 'child in need' statutory assessment. Early Help means providing support as soon as a problem emerges in a child's life, from the foundation years through to teenage years
- Develop best practice for the safe recruitment of staff checking suitability, identity and validity for all staff (both paid and volunteering) including annual review of recruitment procedures to ensure they remain fit for purpose.
- Ensuring wherever possible every measure is being taken to deter those with a history of abusing children and/or young people or vulnerable adults do not apply for employment/placement at MTL
- Ensuring wherever possible every measure is being taken to deter those with a history of recruiting children and/or young people of vulnerable adults to promote their extremist views do not apply for employment/placement at MTL
- Provide effective staff development on all aspects of safeguarding and child protection including tackling extremism
- Ensuring everyone understands their legal and moral obligations to protect children, young people and vulnerable adults from harm, abuse and exploitation
- Ensure our safeguarding policies and procedures are fit for purpose and reviewed at a minimum annually
- Support learner/students who we suspect are subject of abuse or disclose abuse or neglect
- Support learner/students who we suspect are being radicalised or disclose are being radicalised
- Establish and maintain safe environments for all staff and learner/students
- Ensure safe use of ICT networks, resources and "Online Safety Guidelines" for all staff and learner/students

MTL will follow the guidelines by the Local Safeguarding Children's Board and take account of guidance issued by Department for Education and other relevant government departments.

MTL will:

- Ensure safe recruitment practices are always followed in accordance with the Company employment and training policies and UK legislation, (as per part three Keeping Children Safe in Education 2018) specifically in respect of the Disclosure and Barring Service Certification.
- Every staff member will be subject to DBS Certification and review
- Ensure that all staff understand their responsibility to work to the standards and procedures set out within MTL quality assurance system
- Ensure all staff understand their obligations to report care/protection and or radicalisation concerns about a child/young person/vulnerable adult to the designated safeguarding lead/s or in their absence deputy
- Ensure Director responsible for safeguarding and Designated Safeguarding Lead (DSL)

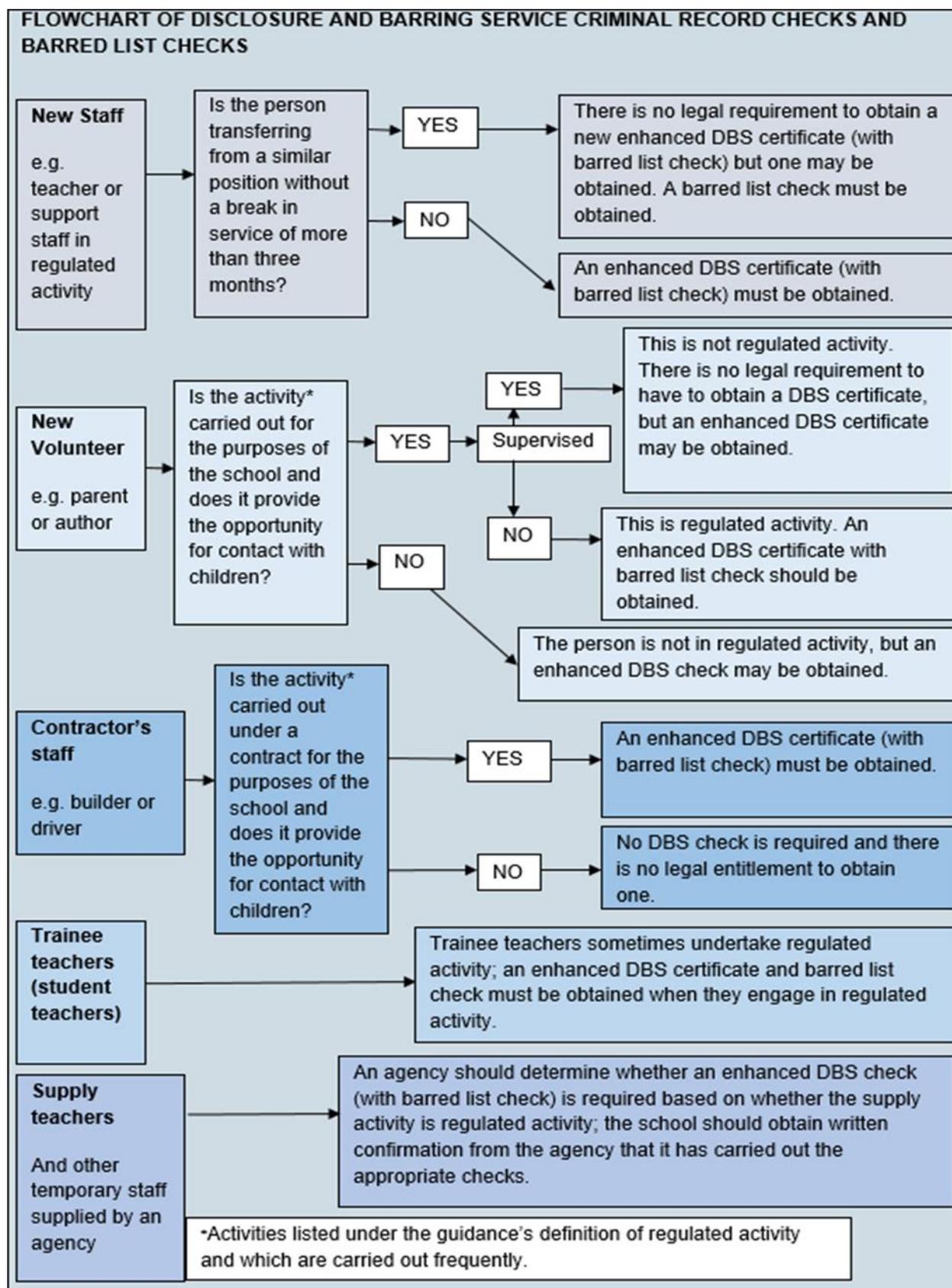
and Deputy DSL understand their role and responsibility to refer any child protection concerns to the statutory child protection agencies LADO and/or Police

- Ensure that Director responsible for safeguarding and DSL and Deputy DSL understand their role and responsibility to refer any learner/student who may be being radicalised or part of an extreme group to Channel and is fully aware of their “Prevent Duty” responsibilities under Counter-Terrorism and Security Act 2015
- Ensure Director responsible for safeguarding and DSL and Deputy DSL are given adequate training to be able to conduct their duties within the role
- Ensure all staff are aware of who the Director responsible for safeguarding is and who the DSL/s and Deputy DSL are
- Ensure during delivery hours at least one of the safeguarding leads are available on site
- Ensure that children, young people and vulnerable adults are enabled to express their ideas and views on a wide range of issues and will have access to the organisations complaints procedures
- Ensure that all learner/students through MTL learner/student involvement strategy have the opportunity to voice their concerns around safeguarding and child protection issues
- Ensure all learner/students are fully consulted with regarding to safeguarding and child protection issues
- Ensure parents/carers/guardians are encouraged to be involved in the work of MTL and, when requested, have access to all guidelines and procedures
- Develop effective links with the appropriate agencies assisting where required with any support they may require in relation to safeguarding, child protection and “Prevent Duty” issues including attending case review meetings
- Develop and then follow internal procedures where an allegation is made against a member of staff. Fully utilising Company Discipline and Grievance procedures where appropriate and relevant
- Ensure ALL staff are fully aware of procedures where an allegation is made against the company director and anyone employed by MTL who is related to the company director
- Keep written records of any concerns about children, young people and vulnerable adults
- Ensure all records are kept in a locked cabinet, separate from learner/student personal files
- Endeavour to keep up to date with developments relating to safeguarding, care and protection of children, young people and vulnerable adults
- Consult with local safeguarding professionals in the development and maintenance of this policy and procedures
- Where MTL are not the prime contract holder procedures in place will ensure any safeguarding incidents involving a child, young person or vulnerable adult on such a contract will be reported immediately to the relevant designated person within the organisation. A nil return will be made via e mail to the named person on a monthly basis.
- Where MTL are the prime contract holder and use sub contractors for delivery ensure a copy of this policy is issued checking at performance review monthly policies and procedures are being adhered to

Recruitment and training of staff and partners

- The safer recruitment policy will be adhered to, thus ensuring every possible measure is taken to deter those with a history of abusing children and/or young people and/or vulnerable adults do not apply for employment or placement at MTL. Safer Recruitment practices will be implemented and adhered to by all staff. It will be the ultimate responsibility of the Company Director to ensure all staff are aware of MTL safer recruitment procedures and are given training around question and answer techniques to be used when a potential new member of staff/volunteer is applying to work at MTL
- DBS Enhanced Checks with barred list: All staff will require prior to taking up employment to have a full Enhanced check with barred list teaching staff will have in addition a prohibition check carried out and QTS along with teacher induction and probation checks.
- The Company Director in addition to a fully enhanced DBS will have a section 128 check carried out
- A single central register will be held securely and updated as required it will include headings as per (144) Keeping Children Safe in Education 2018
- Recruitment procedures should be strictly adhered to, this will ensure every possible step has been taken to eliminate employment of individuals who are not suitable to work with children, young people and vulnerable adults.
- Employers who MTL contract with for placement and or employment purposes are given a copy of this policy and are advised it is their responsibility to ensure staff they employ are safe to work with young people and vulnerable adults. Currently employers are signposted by Business Development Advisors at MTL to information around safe working practices and safe recruitment of staff.
- Learner/students attending the 14-16 Alternative Curriculum Programme will not be placed with an employer, other than at MTL unless the Company Director has ensured that the employer has been taken through a comprehensive training package around working with young people and has received the same checks and safeguarding training as all the staff at MTL.
- All guest speakers who attend the centre to deliver sessions to the above cohort of young people will be required to produce evidence they hold a current fully enhanced DBS certificate and will not be unsupervised with the group.

Disclosure and Barring Service Criminal Record Checks



Individuals who have lived or worked outside the UK

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges. In addition, schools and colleges must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. The Home Office guidance on [criminal records checks for overseas applicants](#) can be found on [GOV.UK](#). These further checks should include a check for information about any teacher sanction or restriction that an EEA professional regulating authority has imposed, using the TRA [Teacher Services'](#) system. See paragraph 130 for further information on using this service. Although restrictions imposed by another EEA regulating authority do not prevent a person from taking up teaching positions in England, schools and colleges should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment.

The department has issued [guidance on the employment of overseas - trained teachers](#). This gives information on the requirements for overseas-trained teachers from the EEA to teach in England, and the award of qualified teacher status for teachers qualified in Australia, Canada, New Zealand and the United States of America.

Staff Training

As part of MTL's 3 year development plan staff training is instrumental to the continuous improvement of the company. All staff are given training annually in the following areas as a minimum: Equality and Diversity, Health and Safety, Safeguarding including Child Protection, Prevent Duty responsibilities and Occupational Competence. MTL are registered with local Early Help Hub and access training through Liverpool Safeguarding Children's Board LSCB

Children and Young People Missing from Education

Mode must ensure all learners are entered onto the daily registers, if a learner fails to attend a text message will be sent via **Text Local**. If the learner does not respond and does not attend Mode should undertake reasonable enquiries to establish their whereabouts and consider notifying the local authority at the earliest opportunity.

Roles and responsibilities

Role of Safeguarding Director

- Ensure MTL meet with statutory guidance to ensure all learner/students are safe
- Ensure where appropriate funding is available to purchase resource required to deliver high quality programmes which have keeping learner/students safe as an absolute priority
- To make available funds to purchase training at Director level, for DSL's and all staff
- To chair MTL safeguarding committee, to support DSL's when making referrals
- To seek support and guidance from external bodies when required
- To review, amend, update policy as and when required in conjunction with DSL's

Role of Designated Safeguarding Leads and Deputy Safeguarding Lead

Their role requires them to:

- Attend all training sessions in relation to safeguarding including “Prevent Duty” and child protection
- Ensure they are familiar with relevant legislation ensuring the policy is legally compliant
- Give staff the advice and support required to improve their confidence when dealing with ALL safeguarding and child protection issues and concerns
- Ensure all staff receive basic training in safeguarding and child protection issues and are aware of MTL policy and procedures
- Maintain records on safeguarding referrals, complaints or concerns raised
- Seek support and guidance as required from external bodies
- Make referrals as required to external bodies
- Ensure the records are shared with Company Director and locked away separate from learner/student personal files
- Liaise with Company Director in relation to safeguarding and child protection issues and concerns raised
- Attend monthly safeguarding committee meetings chaired by Company Director
- Director responsible for Safeguarding Debbie Tagoe, Emma Sinnett Debbie Pearson DSL’s will review and amend the policy ensuring it remains fit for purpose and current at least annually

All staff and volunteers should:

- Contribute to ensuring learner/students learn in a safe environment.
- Complete a full MTL staff induction signing a declaration to confirm they have received and will read and understand the following:
 - Child protection policy/safeguarding policy
 - Behaviour policy
 - Staff code of conduct
 - Whistleblowing policy
 - Safeguarding response to children missing from education
 - Role of safeguarding lead and deputy including role of lead when an allegation has been made against the company director or a member of staff who she is related to
 - Read and understand as a minimum part 1 of the DFE (2018) guidance Keeping Children Safe in Education and engage in training which enables them to identify children who may need additional help or who are suffering or likely to suffer significant harm and take appropriate action. Staff should understand the specific safeguarding issues outlined in part 1 of the DFE (2018) guidance Keeping Children Safe e.g. fabricated or induced illnesses, faith abuse. Be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger

- Be issued with read and understand Annexe A further information of Keeping Children Safe in Education 2018
- Follow all MTL policies including this safeguarding policy and the MTL code of conduct for staff and the Guidance for Safer Working Practices for Adults Working with Children
- Report any concerns about a child's welfare without delay to the Designated Safeguarding Lead or any of the safeguarding team. Report any concerns without delay about the behaviour of an adult towards a child/vulnerable adult to the Director, Designated Safeguarding Lead, or Local Authority Designated Officer LADO for Allegations against Staff (0151 233 3700).
- Understand their responsibility to escalate their concerns and 'press for reconsideration' if a child remains at risk or their needs are not met. This includes the understanding that any member of staff can make a referral to Children's Services if required to. (Liverpool Careline 0151 233 3700). Staff **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.
- Understand their responsibility to escalate their concerns and 'press for reconsideration' if a child remains at risk or their needs are not met. This includes the understanding that any member of staff can make a referral to Children's Services if required to. (Liverpool Careline 0151 233 3700).
- Be aware safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. Staff should recognise that children can abuse their peers. Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing particularly towards girls. Behaviours by children should never be passed off as 'banter' or 'part of growing up'. The DFE states '*peer on peer abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures. Professionals should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.*'

Concerns should be referred to senior staff who may need to consult with the Designated Safeguarding Lead. Victims of peer on peer harm should be supported by the MTL pastoral system and referred to specialist agencies including, as examples, 'CAMHs', 'Brook' and 'Barnardo's'. A risk assessment may need to be in place. MTL will support young people to become more resilient to inappropriate behaviours towards them, risk taking behaviours and behaviours that children may be coerced into including 'sexting' or 'initiation/hazing' behaviours.

- Understand that some children, including those with Special Educational Needs or Looked After, may be more vulnerable to abuse. 'Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. This can include:
 - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
 - children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs; and

- communication barriers and difficulties in overcoming these barriers.’
- Have access to the MTL managing allegations against adults’ procedures and whistle blowing policy.
- (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.)
- Have access to ‘What to do if you are worried a child is being abused 2015 - Advice for practitioners DFE 2015’

Good practice for staff

- Keep up to date with issues regarding safeguarding and child protection by attending annual staff training sessions, reading material handed out during staff meetings and accessing information in MTL safeguarding child protection file.
- Staff should work in the open where their activities are visible to all Staff should wherever possible ensure they are not alone with a child, young person/vulnerable adult
- Staff should maintain a safe and appropriate distance with children,young people/vulnerable adults. Although it is expected staff to be friendly towards all learner/student’s it is not advisable for staff to treat a learner/student as they would a friend – professionalism should be maintained at all times
- Touching should be avoided at all times
- Staff should adopt safe working practices themselves and ensure all learner/students follow their lead
- Staff should ensure they challenge learner/students during lessons if they are not following safe working practices
- Staff should encourage learner/students to read posters around the centre which promote Safeguarding
- Staff should adopt a Zero tolerance to bullying and always challenge behaviour they feel inappropriate during lessons
- Inappropriate use of language and or bad behaviour should ALWAYS be challenged by staff
- Staff should always raise concerns where they feel there is a change in learner/students behaviour
- Staff should share any concerns they may have regarding behaviour of learner/students, so as other staff can also monitor the situation – this is only for minor incidents e.g. a learner/student persistently uses bad language during a lesson

The section above provides staff with points of good practice, the following section are rules which should be adhered to at all times:

Rules and Regulations for staff

The following rules and regulations should be adhered to at all times by all staff:

- Never allow or engage in any form of inappropriate touching
- Never engage in rough, physical or sexually provocative games
- Never making sexually suggestive remarks to a child, young person or vulnerable adult
- Never discuss personal matters with a young person or vulnerable adult or with a

- colleague in ear shot of a young person or vulnerable adult
- Never reduce a child, young person or vulnerable adult to tears by means of control
- A learner/student should never be invited to visit the home of a member of staff, phone, e-mail or text a child, young person or vulnerable adult on a personal matter – must be kept to company business without exception
- If you use social networking sites you should never add a learner/student onto your page – MTL uses social networking sites as a means of marketing with young people and the official page should be the only one a member of staff has access to a learner/student's profile, page etc
- Never chat on-line with a child, young person or vulnerable adult
- Never offer gifts to a child, young person or vulnerable adult
- Unless in an absolute emergency, (i.e. taking a learner/student to hospital if there has been an accident) never share a car with a learner/student unless accompanied by a responsible adult and if so always make sure your car insurance covers you to do so
- If you are unhappy regarding an incident you have heard about or witnessed which involves another member of staff it is your responsibility to instigate MTL whistle blowing procedures, never leave reporting an incident to someone else

What is abuse?

Physical abuse: This includes hitting, burning, punching and slapping

Emotional abuse: This is the persistent emotional ill treatment that can cause severe long term effects on a young person's emotional development. It may involve for instance, conveying to a young person that they are worthless, unloved and inadequate, or valued only in so far as they meet the needs of another person

Sexual abuse: This involves forcing or enticing a child, young person or vulnerable adult to take part in sexual activities, whether or not the child, young person or vulnerable adult is aware of what is happening. The activities may involve physical contact or not- penetrative acts. They may

include non- contact activities such as involving children, young people and vulnerable adults in looking at, or, in the production of, pornographic material or encouraging them to behave in sexually inappropriate ways

Neglect: This is the persistent failure to meet a child's, young person's or vulnerable adults basic physical and/or psychological needs, which is likely to result in the serious impairment of their health or development. It is failing to provide adequate food, shelter and clothing, failing to protect them from harm or danger and failing to ensure access to appropriate medical care or treatment. It can also include neglect of, or unresponsiveness to their basic emotional needs.

Domestic Violence: Prolonged and/or regular exposure to domestic violence can have a serious impact on a child's, young person's or vulnerable adults development and emotional well-being, despite the best efforts of the parent who may be the victim, to protect them. The exposure to parental conflict, even where actual violence is not present can lead to serious anxiety and distress. Children, young people and vulnerable adults are likely to show signs of stress because of domestic violence. This may result in behavioural problems, depression, and a tendency to aggression or withdrawal.

Discriminatory abuse: This may include abuse, bullying and harassment including forms of cyberbullying based on the individual's age, sex, gender, disability, religion and or belief, race-nationality-country of origin or sexual orientation. Some of the recognised signs of discriminatory abuse might be very similar to psychological and emotional abuse.

Child sexual exploitation (CSE): Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591512/HO_DfE_consultation_response_on_CSE_definition_FINAL_13_Feb_2017_2.pdf

Young people who are being sexually exploited may:

- 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
- go missing from home, care or education

Forced Marriage and Honour Based Violence: Forced Marriage (FM) and Honour Based Violence (HBV) is a cultural phenomenon and can affect any communities. Dealing with such cases requires sensitivity, quality of support and consideration of special measures to ensure safeguarding and health and wellbeing of those who are victim, or at risk of, forced marriage and HBV.

Arranged Marriage: In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the prospective spouses.

Forced Marriage: Forced marriage is a marriage conducted without the valid consent of one or both parties, where some element of duress is a factor.

So called 'honour' based violence: So, called 'honour' based violence (HBV) is where the person is being punished by their family or their community. They are being punished because of a belief, actual or alleged, that a person has not been properly controlled enough to conformity and thus this is to the 'shame' or 'dishonour' of the family.

One Chance Rule

All practitioners working with victims of forced marriage and HBV need to be aware of the '**one chance' rule**. That is, they may only have **one chance** to speak to a potential victim and may only have **one chance** to save a life. This means that all practitioners working within statutory agencies need to be aware of their responsibilities and obligations when they become aware of potential

forced marriage/ HBV cases. If the victim is allowed to walk out the door without support being offered, that **one chance** might be wasted.

Remembering the '**one chance rule**' the agency should carefully question the person concerned as cases are frequently complex and highly sensitive to the individual.

The reason behind the forced marriage and HBV may be due to sexuality or disability as well as cultural belief. Most victims will be women, but this does not mean that there are not male victims. All cases should be dealt with seriously.

There is no specific offence associated with forced marriage or HBV, but the victim concerned may have been subjected to several offences (please see 'Legislation' section).

Initially agencies will need to consider completing the following:

- Ensure the victim is seen in a safe and private place
- See the victim on their own. If an interpreter is needed, take steps to ensure that the interpreter is not connected with the individual or community
- Risk assess and discuss a safety plan
- Where victim is under 18, refer to child safeguarding procedures
- Where the victim is over 18, refer to adult safeguarding procedures
- Inform the victim of their right to seek legal advice and representation
- Identify any potential criminal offences and refer to the police if appropriate
- Reassure the victim. This will include ensuring that their confidentiality¹ is maintained
- Establish a safe way of maintaining contact with the victim
- Make a note of all the information available to you at the time, including a description of the victim and details of any known or alleged perpetrators and potential immediate risks
- Record any current contacts with other professionals, health, social services, third sector etc
- Provide accurate information to the victim about their rights and choices and respect their wishes when possible, remembering that in certain instances information may be shared without consent, for example, child protection
- Contact a specialist in forced marriage for further advice and support
- Consider the need for immediate protection and placement away from the family

Do Not

- Attempt to mediate
- Send the victim away without having taken appropriate action
- Approach family members and/or members of the community without an express request from the victim
- Breach confidentiality or share information inappropriately, unless due to safeguarding concerns for a child or vulnerable adult

Female genital mutilation (FGM): Includes procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK. An estimated 137,000 women in the UK are affected by female genital mutilation. A girl or woman who's had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet have unusual behaviour after an absence from school or college

- be particularly reluctant to undergo normal medical examinations ask for help, but may not be explicit about the problem due to embarrassment or fear

Bullying: Staff should also be mindful of the threat of bullying. Children, young people and vulnerable adults are all vulnerable to bullying, which is deliberately hurtful and harmful behaviour, usually repeated over a period of time from which it is difficult to defend. It can take many forms but the three main types are:

- **Physical:** Examples are hitting, kicking, theft, extortion, happy slapping
- **Verbal:** name calling, racial or homophobic remarks, remarks in reference to a young person's appearance or the area where they live, threats
- **Emotional:** Isolating an individual from the activities and social acceptance of other young people

The damage inflicted by bullying must not be under-estimated: it can cause considerable distress, affect the child's, young person's or vulnerable adults health and development and cause significant harm.

All suspicions or allegations of bullying should be reported, full investigations should be conducted and if appropriate safeguarding/child protection procedures invoked.

Peer on Peer abuse and sexting: Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages.

They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages.

Sexting may also be called:

- trading nudes
- dirties
- pic for pic.

Peer on peer abuse often involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators having control over the relationship which makes it difficult for those they abuse to defend themselves. This imbalance of power can manifest itself in several ways. It may be physical, psychological (knowing what upsets someone), or social (e.g. isolating or excluding someone). It could also include issues such as revenge porn or what are often gender issues (e.g. girls being touched or boys being involved in initiation activities).

Peer on peer abuse should be addressed as a child or vulnerable adult protection concern when there is reasonable cause to suspect that a child or vulnerable adult is suffering, or is likely to suffer, significant harm. Sexting involving those under the age of 18 must always be referred to a Designated Person.

Section 3

Procedures for responding to concerns about abuse/neglect

A concern regarding abuse of a young person usually falls into one of the three categories listed:

- A child, young person or vulnerable adult alleges abuse
- A third party reports a child, young person or vulnerable is being abused
- There are signs and indicators which point to abuse

A child, young person or vulnerable adult alleges abuse

If a child, young person or vulnerable adult talks about possible abuse, the member of staff should:

- Try to react calmly, never ever go and get another person to listen to the disclosure instead of you, there is a reason this child, young person or vulnerable adult has chosen you to make the disclosure to
- Remember the child, young person/vulnerable adult will be anxious or frightened and even intimidated
- Confirm to the child, young person/vulnerable adult they have not done anything wrong, they are right to speak up and are not to blame
- Listen carefully and treat the information you are being given seriously.
- Do not ask direct questions. Avoid Who? What? When? Where?
- Encourage the child, young person/vulnerable adult to talk; do you want to talk about this? But never ever apply pressure on him/her.
- Do not prevent the child, young person/vulnerable adult from recalling events, your role is to listen and make detailed notes of the conversation
- Reassure the young person but do not promise confidentiality, explain you will need to pass the information on to someone else who will be able to help – always let them know who this person is and only people who need to know will be given the information disclosed
- Immediately complete a cause for concern form and ensure this is given to DSL or Deputy DSL

The member of staff should **NEVER**

- Panic
- Allow their shock or distaste to show
- Probe for more information than is offered
- Speculate or make assumptions about what has happened
- Make negative comments regarding the alleged abuser
- Approach the alleged abuser
- Agree to keep the information given secret
- Take no further action, every case must be reported and a safeguarding incident form completed and given to the appropriate member of staff

When the child, young person/vulnerable adult has finished, make a detailed note on the incident form of the date, time, place, what was said and what happened, sign and date the form, if any other member of staff is present they should also sign the form.

As soon as possible the information should be passed over to Amanda Clarke or Emma Sinnett Designated Person/s responsible for Safeguarding/Child Protection or in their absence Debbie Tagoe who will then follow the relevant company procedure.

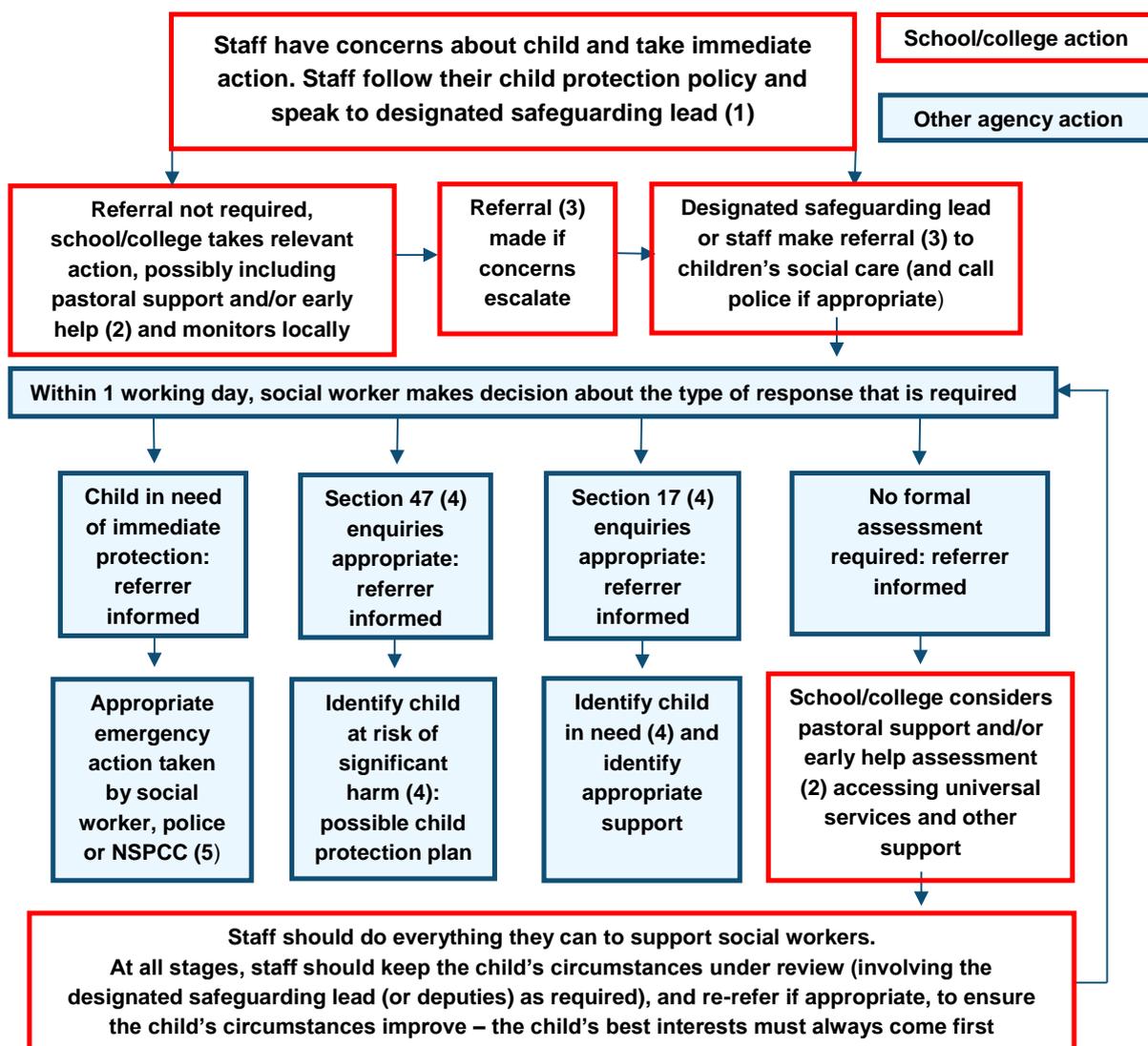
A third party reports a child, young person or vulnerable adult is being abused

If a third party reports a child, young person or vulnerable adult is being abused the incident form should also be completed with the third party and the information given to Amanda Clarke or Emma Sinnett Designated Person/s responsible for Safeguarding/Child Protection or in their absence Debbie Tagoe who will then follow the relevant company procedure.

There are signs and indicators which point to abuse

If there are signs of abuse the incident form should be completed giving as much information as is available, the person completing the form should make clear the reasons why they suspect abuse is taking place. Once completed the form should be given to Amanda Clarke or Emma Sinnett Designated Person/s responsible for Safeguarding/Child Protection or in their absence Debbie Tagoe who will then follow the relevant company procedure.

Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of Keeping Children Safe in Education 2018.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

Monitoring and Evaluation

The effectiveness of this policy will be reviewed annually, or at any time seen fit following an incident which required additional intervention from outside agencies. Feedback from staff, parents/carers, young people and external agencies will be used to measure the effectiveness of the policy.

Policy review will be by Debbie Tagoe – Company Director in conjunction with Emma Sinnett Debbie Pearson and Amanda Clarke

This policy was produced by Debbie Tagoe Emma Sinnett and Amanda Clarke on behalf of MTL and included staff consultation.

Signatures

Signed:

Dated:

Debbie Tagoe
Company Director

Signed:

Dated:

Emma Sinnett
Designated Safeguarding Lead

Signed:

Dated:

Amanda Clarke
Deputy Designated Safeguarding Lead

Policy Review

Date of review	Review completed by	Overview of any updates
04/08/2020	Debbie Carney (Tagoe)	Contents list update at front of policy Amended Useful Contacts: Liverpool Safeguarding Children Board changed to Liverpool Safeguarding Children Partnership website address updated Added in Merseyside Adult Safeguarding Board details

Appendix 1

Preventing extremism and radicalisation

Objectives

- Ensure all children, young people and vulnerable adults who are involved in activities, training, events and work experience organised by MTL are properly safeguarded in the duty of Counter-Terrorism and Security Act 2015
- To ensure all MTL employees, volunteers, employers and work experience providers are aware of and are undertaking correct safeguarding procedures, inclusive of the identification, recording and reporting of suspected cases of abuse, extremism and radicalisation
- Ensure MTL remain up to date with legislation and practice relating to PREVENT strategy
- To promote awareness and actively promote the principles of PREVENT strategy and the various forms of radicalisation
- To work in partnership with children, young people, vulnerable adults, their parents, carers and other agencies and key stake holders
- To ensure that all staff, volunteers, employers, work experience providers, consultants and learner/students are equipped to recognise extremism and are skilled and confident enough to challenge it
- MTL will actively promote British Values as set out by department for education, the five key British Values being:
 - Democracy
 - The rule of law
 - Individual liberty
 - Mutual respect
 - Tolerance of those of different faiths and beliefs

Recognising Extremism and Radicalisation

- There is no place for extremist views of any kind at MTL, we recognise that extremism and exposure to extremist views can be damaging to the health and well being of children, young people and vulnerable adults who we have a duty of care to
- MTL will educate and prepare young people with the knowledge skills and critical thinking skills to challenge and debate in an informed manner
- Influences that can make an individual vulnerable to engagement with an extremist group, cause or ideology include:
 - feelings of grievance or injustice
 - feeling under threat
 - a need for identity or belonging
 - desire for status
 - desire for excitement or adventure
 - a need to dominate or control others
 - desire for political or moral change
 - opportunistic involvement
 - family or friends involved in extremism
 - transitional point in life
 - influenced or controlled by group
 - relevant mental health issues

Indicators an individual is engaged with an extremist group, cause or ideology could include:

- changing style of dress or personal appearance to accord with the group
- change in attitude or views
- spending time in the company of other suspected extremists
- spreading messages
- non attendance at college
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- possession of materials or symbols associated with an extremist cause e.g swastika for far right groups
- communication with others that suggest identification with a group/cause/ideology
- asking questions around certain topics
- Adopt a 'them and us' approach
- spreading messages to others
- overt new religious practices
- prone to outbursts
- other changes in behaviour associated with neglect and a change in someone's emotional wellbeing

Wider safeguarding responsibilities of staff

Any prejudice, discrimination or extremist views, including derogatory language displayed by employees or learner/students will always be challenged and where appropriate dealt with.

As part of wider safeguarding responsibilities MTL employees and volunteers will be alert to:

- Disclosures by learner/students of their exposure to the extremist actions, views or materials of others outside of Mode, such as in their homes or community groups
- Graffiti symbols, writing or art work promoting extremist messages or images
- Learner/students accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendships or actions and requests for our assistance
- Learner/students voicing opinions drawn from extremist ideologies and narratives
- Use of extremist or hate terms to exclude others or incite violence
- Intolerance of difference whether secular or religious or, in line with our equality and diversity policy, views based on, but not exclusive to, gender, disability, homophobia, race, colour or culture
- Attempts to impose extremist views or practices on others
- Anti-Western, Anti-British or Anti-Islamic views

Any identified concerns as a result of observed behaviour or report of conversations to suggest that a learner/student supports terrorism and/or extremism, must be reported to the Safeguarding Officer immediately in line with MTL reporting concerns procedure

MTL will closely follow any local agreed procedure as set out by Local Authority and/or Local Safeguarding Children's Board's agreed processes and criteria for safeguarding individuals vulnerable to extremism and radicalisation

Use of External Agencies and Speakers

We encourage the use of external agencies, visits or speakers to enrich the experiences of our learner/students. We will assess the suitability and effectiveness of input from external agencies and individuals to ensure that:

- Messages communicated to employees, employers and learner/students are consistent with the ethos of the organisation and do not marginalise any communities groups or individuals
- Messages do not seek to glorify criminal activity or violent extremism or seek to radicalise learner/students through extreme or narrow views of faith, religion, culture or other ideologies
- Activities are matched to the needs of learner/students
- Activities are carefully evaluated to ensure they are effective

We recognise it is within our culture to encourage learner/students to understand opposing views and ideologies and be able to actively engage with them in informed debate and we may use external agencies or speakers to facilitate and support this.

By delivering a broad and balanced curriculum, augmented by the use of external sources where appropriate will ensure our learner/students can recognise risk and build resilience to manage any such risk themselves whilst also encouraging learner/students to develop critical thinking skills needed to engage in informed debate.

Learner/students awareness of Safeguarding and Extremist Views

- All learner/students are issued with induction materials which include contact details for reporting safeguarding and equality and diversity concerns
- Safeguarding overview is posted on the back of every classroom door
- Mode promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance for those with different faith or beliefs
- MTL will work with local partners, stakeholders and communities in our efforts to guarantee understanding and embrace our local context and values in challenging extremist views
- We will support learner/students who may be vulnerable to such influences as part of our wider safeguarding duties
- Mode will always seek support when needed from LCSB and LA partnerships working to prevent extremism
- All learner/students are made aware of methods to report concerns to ensure opportunities are not missed

Whistle Blowing

Where there are concerns of extremism or radicalisation learner/students and employees will be encouraged to raise any issue in confidence by fully utilising MTL whistle blowing policy and procedure

Training

- Designated safeguarding officers will receive annual external safeguarding training including training on extremism and radicalisation and it's safeguarding implications
- All staff will receive at least annual safeguarding training including training on extremism and radicalisation to include the responsibilities of PREVENT DUTY
- Safeguarding training is mandatory for ALL staff and volunteers, refusal to undertake safeguarding training will be a matter of gross misconduct and may lead to dismissal
- All curriculum staff will ensure their learner/students are given adequate safeguarding/radicalisation awareness in line with their age and ability

Resources:

- Free DFE prevent training can be found here:
<https://www.elearning.prevent.homeoffice.gov.uk/>
- DFE 'Educate against Hate' website
- Advice on Promoting Fundamental British Values in Schools' (DfE 2014)
- The Prevent Duty (Statutory Guidance for Schools and Childcare Providers DfE 2015)
- How Social Media is used to encourage travel to Syria and Iraq (Briefing Note to Schools, DfE 2015)
- Confidential Anti-Terrorist Hotline 0800 789 321
- My Former Life Project – foundation4peace.org
- www.got.uk.net/
- www.preventforschools.org (all secondary settings have free access to this)
- Safer Internet Centre Website
- CHANNEL general awareness training module- DfE website
http://course.ncalt.com/Channel_General_Awareness/01/index.html
- Think u know website

Appendix 2

Female Genital Mutilation:

Guidance provided by Liverpool Safeguarding Board:

The World Health Organisation (WHO) defines 'Female Genital Mutilation', also referred to as 'Female Genital Cutting' and 'Female Circumcision' as: all procedures that involve partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons.

According to the WHO, between 100 and 140 million girls and women worldwide have undergone some sort of FGM and each year a further 2 million girls are at risk.

The International Centre for Reproductive Health estimates that in the UK 279,500 women have undergone FGM, and approximately 22,000 girls under the age of 18 are at risk each year.

FGM is practised in more than 28 countries across Africa, Asia and the Middle East Burkina Faso, Djibouti, Egypt, Eritrea, Ethiopia, The Gambia, Guinea, Liberia, Mali, Mauritania, Sierra Leone, Somalia and Sudan. UK communities most at risk include Kenyan, Somali, Sudanese, Sierra Leoni, Egyptian, Nigerian and Eritrean as well as non-African communities including Yemeni, Afghani, Kurdish, Indonesian and Pakistani.

National Legislation

In England, Wales and Northern Ireland all forms of FGM are illegal under the Female Genital Mutilation Act 2003. A person is guilty of an offence if he/she, excises, infibulates or otherwise mutilates the whole or any part of a girl's labia majora, labia minora or clitoris except for operations performed on specific physical and mental health grounds by registered medical or nursing practitioners. It is also an offence to assist a girl to mutilate her own genitalia. FGM is an offence which extends to acts performed outside of the UK and to any person who advises, helps or forces a girl to inflict FGM on herself. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 will be liable to a fine or imprisonment of up to 14 years, or both.

FGM is a form of child abuse as it is illegal and is performed on a child who is unable to resist or give informed consent.

'Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18' DFE 2016

At what age is FGM carried out?

The age at which FGM is carried out varies greatly. It can be carried out any time from shortly after birth up to adulthood. Girls between 4 and 14 years of age are most at risk. In adults FGM may be carried out immediately before marriage and immediately after childbirth.

FGM is usually carried out by an older woman in a practicing community, for whom it is a way of gaining prestige. It can also be a lucrative source of income.

The procedure is normally carried out by several women unexpectedly approaching a girl and holding her down on the floor. Hazards include lack of medical expertise, lack of anaesthesia and lack of hygiene. Instruments used can include unsterilized household knives, razor blades, broken glass and stones.

Types of FGM

FGM has been classified by the World Health Organisation into 4 types:

Type 1 - (Sunna-circumcision) Cutting away the clitoral hood, with or without the removal of the clitoris

Type 2 - (Excision) Removal of the clitoris with partial or total removal of the labia minora

Type 3 - (Infibulation) Removal of the clitoris, labia minora and labia majora with stitching of the vaginal opening

Type 4 -Involves tribal cutting or burning of the vaginal orifice or the use of corrosives to narrow the vaginal passage. This may include pricking, piercing, incision and scraping.

Justifications used by those who practice FGM

There is no social, moral or religious justification for FGM. However, those who support FGM may use the following reasons or 'myths' to try to explain the practice. They may say FGM:

- Is part of being a woman;
- Is a rite of passage;
- Gives a girl social acceptance, especially for marriage;
- Gives the girl and her family a sense of belonging to the community;
- Fulfils a religious requirement mistakenly believed to exist;
- Perpetuates a custom / tradition;
- Helps girls and women to be clean and hygienic;
- Is mistakenly believed to make childbirth safer for the infant.

Signs, symptoms or indicators of a young person at risk of FGM

- The child's mother or relative has undertaken FGM
- Being withdrawn by parents/carers from sex education lessons
- A child talking about a special ceremony
- A family arranging a long holiday abroad
- Knowledge that an older sibling has undergone FGM
- A child belonging to one of the high-risk communities listed above
- A young person talking of getting ready for marriage, becoming a woman or being cut
- A young person becoming withdrawn and anxious
- A young person being concerned about a forthcoming holiday or a visit by a relative
- The socio-economic position of the family and the level of integration within UK
- Society can increase risk
- A child may talk about a long holiday (usually within the school summer holiday) to her country of origin or another country where the practice is prevalent

- A child may confide to a professional that she is to have a 'special procedure' or to attend a special occasion
- A professional hears reference to FGM in conversation, for example a child may tell other children about it
- Parents state that they or a relative will take the child out of the country for a prolonged period

Signs, symptoms or indicators of children who may have been subject to FGM

- Prolonged absence from school
- Changes in behaviour following a holiday e.g. becoming more secretive
- Becoming more withdrawn or subdued or isolating themselves from others
- Looking uncomfortable or finding it difficult to sit still
- Complaining about pain in their groin
- Menstrual problems or bladder/urinary tract infections
- Talking about having to keep a secret
- Avoiding physical activity

Professionals should be aware of the ONE CHANCE RULE whereby a young person may say something that suggests they are at risk.

What we should do:

- Listen to the child alone
- Contact Careline and the police without delay
- also read in full the revised LSCB FGM multi-agency procedures at <http://www.liverpoolscb.org/>
- If you identify a female under 18 has had FGM you have a duty to report this under the Serious Crime Act (2015) to the police via the non-emergency number 101

Any information or concern that a child or Adult at risk is at immediate risk of, or has undergone, FGM must result in a safeguarding referral to the Local Authority Social Care following your usual procedure for your local area and the Police. Immediate danger dial 999')

Multi agency guidance can be found here:

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

What you should NEVER do:

- Delay sharing information
- Attempt to mediate with the family or the community
- Inform the parents they have made a referral **without** the consent of police and children's services

Remember: The parents may believe they are doing the right thing by their child and informing them may put the child at risk because they may act to silence her or bring forward their plans to take her abroad or undertake FGM.

We must remember that FGM is gender-based violence and not a cultural practice or celebration of a girl's development.

NSPCC FGM Helpline:0800 028 3550 Email: fgmhelp@nspcc.org.uk

The same services listed at the end of the Forced Marriage, can be contacted for support and advice for FGM.

Further guidance:

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

Online training can be found here:

<https://www.FGMelearning.co.uk/>

Appendix 3

Receiving an allegation about a member of staff

See Part Four Keeping Children Safe in Education 2018 for further guidance

An allegation of abuse by a learner/student against a member of staff, may be for a variety of reasons, it is important the situation is dealt with quickly and effectively. Those dealing with the allegation should maintain an open mind and conduct a thorough timely investigation.

Mode also recognises the duty of care placed upon the organisation to ensure the welfare of the children/young people and vulnerable adults placed in our care is of the utmost importance.

Mode also recognise the a knee jerk reaction would serve no purpose and ill informed judgements made could have a long term detrimental effect on the member of staff involved. It is therefore important the investigation is carried out in sensitive and carefully measured manner.

Reporting and dealing with allegations of abuse against a member of staff Guidance provided by Liverpool Safeguarding Board:

The provider follows the guidance set out in part 4 of [Keeping Children Safe in Education](#).

- Any concerns about the behaviour of any adult working within the setting towards a learner/student should be brought to the attention of the Director responsible for safeguarding and Designated Safeguarding Lead without delay. Concerns about the Director or a member of staff who is related to her should be referred to Debbie Pearson DSL immediately
- Consideration should be given to immediately protecting the child and the need to contact the police.
- The Local Authority Designated Officer LADO is the linchpin in the process and should be contacted without delay to discuss allegations against staff
- Referrals to Careline (0151 233 3700) will be made when a member of staff or volunteer may have:
 - Behaved in a way that has harmed a child/vulnerable adult, or may have harmed a child/vulnerable adult
 - Possibly committed a criminal offence against or related to a child/vulnerable adult; or
 - Behaved towards a child or children/vulnerable adults in a way that indicated he or she would pose a risk of harm to children
- The LADO will advise if the parents and member of staff can be informed of the allegation.
- The LADO will advise how to manage speculation, leaks and gossip and whether it would be prudent to contact the Local Authority Press Office, and any information which might be reasonably given to the community to reduce speculation. In line with Keeping Children Safe in Education, staff and the child's/vulnerable adults family will be advised about the legislation on imposing restrictions which makes clear that the 'publication' of material that may lead to the identification of the member of staff who is the subject of the allegation is prohibited.

- The provider will only begin a disciplinary investigation when advised by the LADO and police that these processes can begin.
- The provider will contact its HR provider. (Where the allegation is so serious that if proven it would be grounds for dismissal the provider should also contact the Local Authority HR Manager.)
- At the point at which the member of staff is notified of the allegation they should be given information about the Managing Allegations Against Adults and Volunteers procedures and nominated a member of staff to support them. They should be advised to seek Trade Union support and consideration should be given to their wellbeing and continued support.
- Suspension is always a neutral act and should not be an automatic response. The decision to suspend a member of staff is the employer's only. However, the provider will need to draw upon the advice of the LADO and Police and, in keeping with the DfE guidance, record the reasons why suspension was chosen over other working arrangements.
- The case manager (Director responsible for safeguarding) will record all actions, discussions and decisions taken in respect of the allegation.
- The provider has a legal duty to refer to the DBS in line with Keeping Children Safe in Education. The provider will not enter into compromise / settlement agreements if a member of staff faces an allegation against them and the agreement prevents sharing concerns about someone's suitability to work with children/vulnerable adults. The provider would also still need to conclude its investigation and when required refer to the DBS.
- The provider has a responsibility to refer to the Secretary of State (National College for Teaching and Leadership) any teacher because of serious misconduct in line with Keeping Children Safe in Education.
- The provider will only include in references substantiated allegations.
- The provider will retain only substantiated, false, unfounded and unsubstantiated allegations on personnel files.
- The record of the allegation will be retained until the member of staff's normal retirement age or for a period of ten years from the date of the allegation if that is longer.
- The provider will consider what support the member of staff, child and family need throughout the process. In cases of malicious allegations, the school will consider whether disciplinary action is appropriate against the child or a referral to the police or Children's Services is required.
- On conclusion of the case the member of the staff will be given a copy of the outcome of the investigation. Consideration should also be given to how practices or procedures should be reviewed to help prevent similar events in the future, including the decision to suspend and the length of suspension. Return to work arrangements will also need to be considered.

Receiving an allegation from a child/young person/learner/student

If a member of staff receives an allegation about another member of the staff the following procedure must be strictly adhered to:

- The allegation should be reported immediately to the Company Director and DSL in the event the allegation is regarding the Company Director or a member of staff who is related to her Debbie Pearson should be the DSL leading on the incident
- Written signed and dated details of the allegation should be provided from the member of staff who has been given the information this will be countersigned by the safeguarding officer leading on the incident
- All information should be recorded times, dates, location and potential witnesses
- An initial evaluation of the incident should be made by the safeguarding team
- Where the allegation is considered to be either a potential criminal act or indicates the child/young person/learner/student has suffered, is suffering or is likely to suffer significant harm the matter should be reported to social services immediately

Outcome following allegation investigations

The following definitions should be used when determining the outcome of allegation investigations:

- ☐ **Substantiated:** there is sufficient evidence to prove the allegation;
- ☐ **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- ☐ **False:** there is sufficient evidence to disprove the allegation;
- ☐ **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- ☐ **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

The Company Director or (where the Company Director or a member of staff related to her is the subject of an allegation) DSL Debbie Pearson should discuss the allegation immediately with the designated officer(s). The purpose of an initial discussion is for the designated officer(s) and the case manager to consider the nature, content and context of the allegation and agree a course of action. The designated officer(s) may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the designated officer(s) to help determine whether police involvement is necessary.

Guidance provided in Keeping Children Safe in Education Part Four should be followed with MTL HR consultants contacted if required.

Appendix 4

Modern Slavery Human Trafficking

Modern slavery could be happening right in front of you whether that's in nail bars, car washes, rural businesses, brothels, massage parlors, or a property in your neighborhood. Across Liverpool City Region, partners are committed to rooting out those individuals who choose to exploit others. It is our duty as a provider of education to ensure we are vigilant and report anything we feel constitutes modern slavery or human trafficking.

Duty to Notify

What is the Duty to Notify?

From 1 November 2015, specified public authorities have a duty to notify the Home Office of any individual encountered in England and Wales who they believe is a suspected victim of slavery or human trafficking.

It is estimated that there were between 10,000 and 13,000 potential victims of modern slavery in the UK in 2013. In 2015, 3,266 potential victims were identified and referred to the National Referral Mechanism (NRM).

The Duty to Notify is intended to gather better data about modern slavery in England and Wales. The 'duty to notify' provision is set out in the Modern Slavery Act 2015, and applies to all police forces and local authorities in England and Wales, the Gang masters Licensing Authority and the National Crime Agency. Home Office staff within UK Visas and Immigration, Border Force and Immigration Enforcement are also required, as a matter of Home Office policy, to comply with the duty to notify.

Voluntary Notifications by Agencies not covered by The Duty

Other organisations, including NGOs, are also encouraged to put forward notifications where they encounter a potential victim of modern slavery who does not want to enter the NRM.

What information should be provided?

The information that must be provided is set out in the Modern Slavery Act 2015 (Duty to Notify) Regulations 2015 (www.legislation.gov.uk/uksi/2015/1743/pdfs/uksi_20151743_en.pdf). This information can be provided by completing a National Referral Mechanism (NRM) form or an MS1 (Notification of a Potential Victim of Modern Slavery) form.

What you should do:

- The Home Office have produced a Fact Sheet and Poster to help raise awareness of the duty to notify/reporting requirements for Modern Slavery and Human Trafficking.
- The materials can be accessed here: <https://www.gov.uk/government/publications/modern-slavery-duty-to-notify>.
- If you or another person is in immediate danger you should dial 999

- If you are a victim of modern slavery, or suspect slavery is happening near you and there is no immediate threat to life you can:
- Call Merseyside Police on **101**
- Report it by calling the Modern Slavery helpline on **0800 0121 700** which is open 24 hours a day 7 days a week
- Report it online at <https://modernslavery.co.uk/contact.html>
- Contact Crimestoppers anonymously on **0800 555 111**
- For more information and for details of other agencies who can offer help and support go to <https://modernslavery.co.uk/need-help.html>
- NYSCB One Minute Guide: [Modern Slavery and National Referral Mechanism](#)

Remember if in doubt pick up the phone and report you could be saving someone's life

Appendix 5

Visitor arrangements and procedures

It is the responsibility of each member of staff to inform reception of the visitors they have attending each day along with the expected time of arrival

On arrival:

- Visitors should report to reception where they will be asked to sign into the visitor's book and confirm who they are visiting
- Visitors who are not known to the receptionist will be asked to provide identification
- Once signed into reception visitors will be issued with a visitor's badge which should always be visually displayed
- All visitors will be issued with a Mode welcome leaflet which they should read carefully whilst waiting
- Receptionist will call the member of staff and inform them their visitor has arrived
- The member of staff will collect the visitor from reception and accompany them throughout their visit
- If there is an emergency during the visit, the member of staff they are visiting will ensure the visitor is aware of the procedure they should follow
- On leaving the centre the visitor will be asked to sign out at reception and return their visitors badge

Useful contacts:

NSPCC Safeguarding Helpline: 0808 800 5000
<http://www.nspcc.org.uk>

Liverpool Safeguarding Children Partnership
Contact: Yvonne.smith@liverpool.gov.uk LSCB development office
<https://liverpoolscp.org.uk/scp>

Merseyside Safeguarding Adults Board

<https://www.merseysidesafeguardingadultsboard.co.uk/>

Social Services: The integrated Children's Service 0151 233 3029
Careline Children's Service 0151 233 3700
Careline Adult Services 0151 233 3800
(for all queries about people aged 18 and over)
Deaf or hard of hearing people can use the Minicom 0151 255 2500

LADO

Ray Said ray.said@liverpool.gov.uk 0151 225 8116
0151 225 8101
0151 737 1999

The Liverpool Safeguarding Team

Contact: Alex Leith /Carolyn Welsh
aleith@nspcc.org.uk
cwelsh@nspcc.org.uk

Early Help Hubs

North Early Help Hub 0151 233 3637
EHLHNorth@liverpool.gcsx.gov.uk

Central Early Help Hub 0151 233 6152
EHLHCentral@liverpool.gcsx.gov.uk

South Early Help Hub 0151 233 4447
EHLCSouth@liverpool.gcsx.gov.uk

Merseyside Police 999 101 0151 709 6010

Child Exploitation and Online Protection Centre 0870 000 3344
www.ceop.gov.uk

Channel 0151 777 8505
Special.Branch@merseyside.pnn.police.uk
Subject of all emails should be: CHANNEL

Merseyside Police Prevent Engagement Team 0151 777 8311
Darren.F.Taylor@merseyside.police.uk

Liverpool Local Authority Prevent Coordinator 0151 233 7015
Clive.Finch@liverpool.gov.uk

Modern Slavery helpline

0800 0121 700

Further information relating to the above can be found on Liverpool SCB website.

http://liverpoolscb.proceduresonline.com/chapters/p_violent_ex.html