

Mode Training Ltd

www.modetraining.co.uk



Safeguarding and Child Protection 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. Statement of intent
2. Associated policies and documents
3. Regulations applicable

Section 2

Roles and Responsibilities

1. Director responsible for safeguarding
2. Designated Safeguarding Lead
3. Deputy Designated Safeguarding Lead
4. Staff and volunteers

Section 3

Recruitment and training of staff and partners

1. Safer recruitment
2. Staff and partner training
3. Rules and expectations for staff and partners

Section 4

Reporting Concerns – Guidance for Learners

1. What should I report
2. How to make a report

Section 5

Reporting Concerns – Guidance for Staff

1. What should be reported
2. How to make a report
3. Responding to a learner who makes a report
4. Learners missing from education
5. Allegations about a member of staff

Section 6

Types of Abuse or Concern

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
12. Peer on Peer abuse
13. Sexting
14. Radicalisation and extremism
15. Modern Slavery Human Trafficking
16. Fabricated Induced Illness
17. Private Fostering

Section 7

Wider Safeguarding Responsibilities of Staff

1. Radicalisation and extremism
2. Use of external agencies and speakers
3. Learners' awareness of safeguarding and extremist views
4. Whistle blowing
5. Training

Section 8

Online Safety

Section 9

Visitor Arrangements

Section 10

Signatures and Review

Annex A

Support for learners and staff

Section 1

Statement of Intent

1. A Statement of Intent

Mode Training Limited (MTL) recognises its responsibility to take all reasonable steps to promote and maintain safe practices 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.

Throughout this policy reference will be made to learners. For the purpose of this policy, this means those under the age of 18 years, vulnerable adults and non-vulnerable adults (adults may not have disclosed their vulnerabilities) attending MTL as an apprentice, adult learner or on any other funded or private training course. Vulnerable adults are anyone over the age of 18 who is at risk of, or susceptible to, harm due to their vulnerability.

This policy should be used as a guide for MTL staff, learners, employers, work experience providers, school mentors, parents and guardians. It should also be issued to anyone who is delivering sessions to Mode learners.

Promotion of this policy is through staff and learner training and inclusion of the policy on the website and during inductions and training. All persons who regularly attend MTL are made aware of the policy, where it can be located and how it applies to them.

All staff are given responsibility for keeping learners safe and are supported to give the confidence they need to appropriately deal with any concerns that are raised. Staff consultation gives ownership and commitment to the policy.

2. Associated policies and documents

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
- Behavior management policy
- Learner attendance policy
- Safer recruitment policy
- Staff code of conduct
- Whistle blowing policy
- Equality Diversity and Inclusion policy
- Disability statement
- Staff handbook

3. Regulations applicable

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 2023
- Working together to safeguard children 2023
- What to do if you are worried a child is being abused 2015
- The Counter Terrorism & Security Act 2015
- Prevent duty guidance 2023
- Definition of CSE for practitioners 2017
- Liverpool Safeguarding Children Partnership (LSCP)

Section 2

Roles and Responsibilities

1. Director responsible for safeguarding at Mode is:

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

Role of Safeguarding Director

- Ensure MTL comply with statutory guidance to ensure all learners are safe
- Ensure, where appropriate, budgeting provides for training and education
- To seek support and guidance from external bodies when required
- To review, amend, update policy as and when required in conjunction with DSL's

2. Designated Safeguarding lead (DSL) is:

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

Role of Designated Safeguarding Lead

- Take lead responsibility for safeguarding at MTL
- Attend DSL training every two years
- Ensure they are familiar with relevant legislation
- Ensure all staff induction and annual safeguarding training is completed
- Review and amend this policy in conjunction with the Director responsible for safeguarding
- Liaise with safeguarding partners and other agencies to keep learners safe
- Make referrals to safeguarding partners and agencies as required
- Maintain records of safeguarding concerns
- Support all staff in their role relating to safeguarding
- Chair safeguarding meetings

3. Deputy Designated Safeguarding Leads are:

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

Wesley Tagoe wesley@modetraining.co.uk 0151 709 4640

Role of Deputy Designated Safeguarding Lead

- Support the DSL in their responsibilities for safeguarding at MTL
- Attend DSL training every two years
- Ensure they are familiar with relevant legislation
- Ensure all staff induction and annual safeguarding training is completed
- Review and amend this policy in conjunction with the DSL and Director responsible for safeguarding
- Liaise with safeguarding partners and other agencies to keep learners safe
- Make referrals to safeguarding partners and agencies as required
- Maintain records of safeguarding concerns
- Support all staff in their role relating to safeguarding
- Attend safeguarding meetings

4. Staff and volunteers

All staff and volunteers should:

- Contribute to ensuring learners are educated in a safe environment.
- Attend an induction and annual safeguarding training
- Read and understand the most up to date version of part 1 of the Keeping Children Safe in Education
- Comply with this policy and associated policies including this safeguarding policy and the MTL code of conduct for staff
- Report any concerns about a learner's safety and welfare, without delay, to the DSL or any of the safeguarding team
- Promote methods of report to learners
- Report any concerns without delay about the behaviour of an adult towards a child/vulnerable adult to the DSL, 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 learner remains at risk or their needs are not met
- Be aware safeguarding issues can manifest themselves via peer on peer abuse
- Understand that some children, including those with Special Educational Needs or Looked After, may be more vulnerable to abuse

Section 3

Recruitment and training of staff and partners

1. Safer recruitment

Procedures for recruitment of staff are outlined in the Safer Recruitment Policy. The Safer Recruitment Policy will be adhered to, thus ensuring every possible measure is taken to deter or those with a history of abusing children and/or young people and/or vulnerable adults, from applying for employment or placement at MTL.

2. Staff Training

At a minimum, all staff will receive safeguarding training at induction and an annual safeguarding training update. The induction and training update will include:

- Introduction to the DSL and DDSL and their role
- Expectations of staff, including the staff code of conduct
- Staff role relating to the implementation of the Safeguarding Policy
- How to identify different safeguarding concerns
- How to appropriately deal with a learner who is reporting a concern
- How to report a concern to the DSL
- Information relating to the main safeguarding concerns at MTL
- Information on further training available

MTL will ensure that all partners either provide their own training or attend the training of MTL.

Further training will be provided to staff and partners in response to individual roles and identified local and national concerns and topics. This will include:

- DSL training every two years
- Prevent training
- Training provided by LSCP
- Training provided by safeguarding partners, agencies and charities
- Externally sourced training for specific topics

3. Rules and Regulations for staff

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

- Follow the staff code of conduct
- 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 learner
- Never discuss personal matters with a learner or in ear shot of a learner
- Never reduce a learner to tears by means of control
- A learner should never be invited to visit the home of a member of staff
- Do not phone, e-mail or text a learner on a personal matter other than if you are doing so as direct as part of your safeguarding role

- Do not add learners to your personal social networking sites
- Never chat on-line with a learner unless using an online teaching platform provided by MTL
- Never offer gifts to a learner
- Never share a car with a learner unless accompanied by another responsible adult
- Doors should remain open in classrooms without windows when teaching 1-2-1 sessions
- 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

Section 4

Reporting Concerns – Guidance for learners

1. What should I report?

Learners can report any incident where either you or someone you know has been harmed or is at risk of being harmed, in any way, by any person. You can also report when you feel unsafe, for any reason or you are worried about the safety of someone else.

2. How to make a report

You can choose to make a report in any way that you decide. This is usually speaking to a member of staff that you feel most comfortable with.

All staff know what action to take to help you. They will share the information you have given them with the right people to get you the help you need. Information you give is only shared with the appropriate people needed to get you the help you need, and we will always keep you up to date with who the information is being shared with before it is shared.

You can also speak to the Designated Safeguarding Lead or one of the deputies:

Emma Sinnett	emma@modetraining.co.uk	0151 709 4640
Amanda Clarke	amanda@modetraining.co.uk	0151 709 4640
Wesley Tagoe	wesley@modetraining.co.uk	0151 709 4640

Section 5

Reporting Concerns – Guidance for staff

1. What should be reported

A safeguarding concern relating to a learner usually falls into one of the three categories listed below:

- A learner makes a disclosure
- A third party reports that a learner may have been abused or harmed or be at risk of abuse or harm
- There are signs and indicators which point to abuse or harm

2. How to make a report

All staff and partners have a My Concern login which they can access securely online via a computer or mobile device. All concerns should be raised on My Concern using the 'Report a Concern' button. Concerns can be raised directly with a DSL or DDSL but must immediately be followed up with a report on My Concern. The concern should include:

- Who reported the concern, including full names and role if applicable
- Dates the concern was raised
- A full detailed report of what has been discussed or witnessed, in the learners own words if they made a disclosure
- Details of what action, if any, has already been taken
- Full names are to be used in all reports, initials should not be used

Concerns will be triaged by the DSL or DDSL before deciding on how to deal with the concern and setting an action plan.

3. Responding to a learner who makes a disclosure

If a learner makes a disclosure, 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 learner has chosen you to make the disclosure to
- Remember the learner will be anxious or frightened and even intimidated
- Confirm to the learner 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 learner to talk; do you want to talk about this? But never ever apply pressure on them
- Do not prevent the learner from recalling events, your role is to listen and make detailed notes of the conversation
- Reassure the learner but do not promise confidentiality, explain you will need to pass

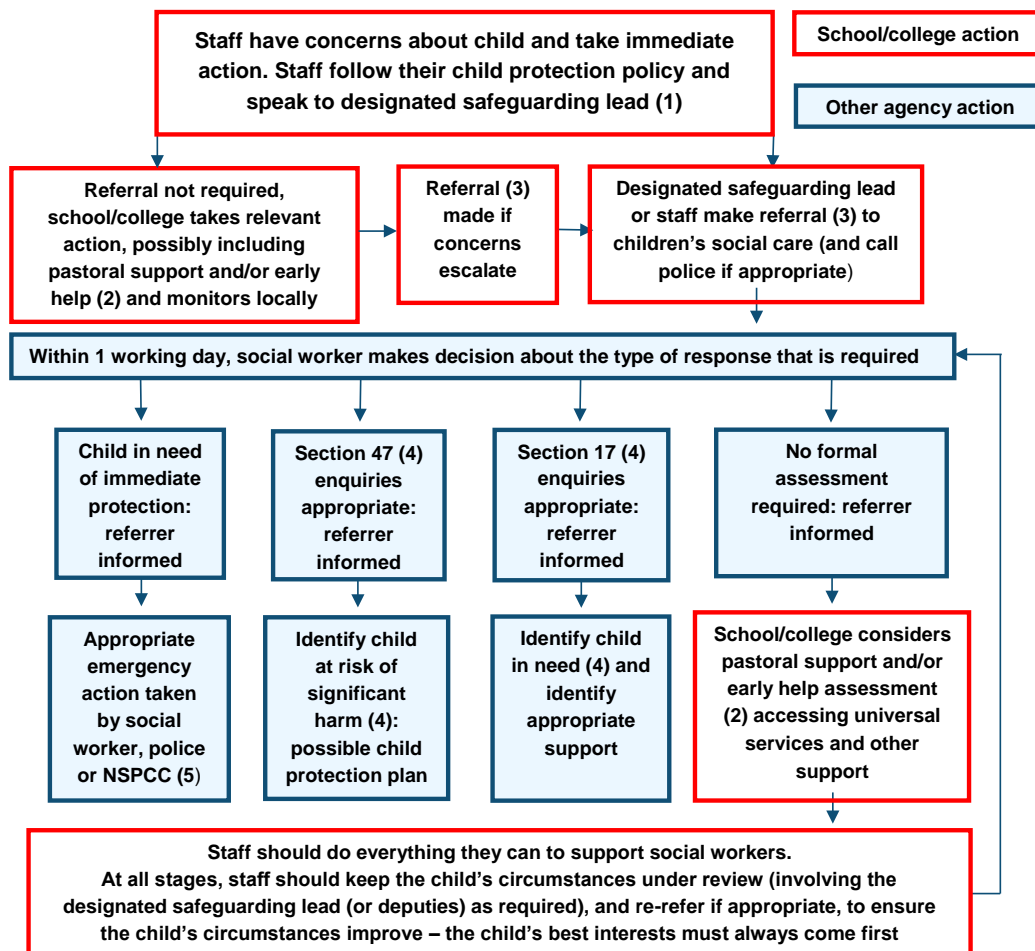
the information on to someone else who will be able to help – always let them know who this person is and only people who need to know will be given the information disclosed

- Immediately complete a detailed safeguarding concern on My Concern and/or discuss this directly with the DSL or DDSL

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 concern raised on My Concern

Actions where there are concerns about a child



4. Learners missing from education

The Attendance Policy details actions to be taken in the event a learner is deemed missing from education. Priority in this situation is to determine if the learner is safe. The policy covers actions to take when a learner does not attend and how and when to escalate an instance of non-attendance.

Attendance is monitored through registers. If a learner is deemed missing from education, this should be escalated to a safeguarding concern.

5. Allegations about a member of staff

Receiving an allegation about a member of staff

MTL recognises the duty of care placed upon the organisation to ensure the welfare of the learners placed in our care and the importance of treating all allegations seriously. An allegation of abuse of a learner, against a member of staff, may be for a variety of reasons. It is important the situation is dealt with quickly and effectively and those dealing with the allegation should conduct a professional and timely investigation ensuring the investigation is carried out in a sensitive and carefully measured manner.

If a member of staff receives an allegation about another member of the staff or witnesses an incident 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, Michael Flood will lead on the incident
- LADO should be informed
- 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 investigation of the incident should be made by the Company Director and DSL
- Where the allegation is considered to be either a potential criminal act or indicates the learner has suffered, is suffering or is likely to suffer significant harm the matter should be reported to social services and police immediately

There should be an initial discussion with LADO and DDSL to consider the nature, content and context of the allegation and agree a course of action. The LADO may ask the reporter to provide or obtain relevant additional information. There may be situations when the LADO 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 reporter should discuss the allegations with the LADO to help determine whether police involvement is necessary.

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 Michael Flood DDSL

Consideration should be given to immediately protecting the child and the need to contact the police if there has been a criminal offense

The Local Authority Designated Officer LADO is the linchpin in the process and should be contacted without delay to discuss allegations against staff and to agree the appropriate action

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 learner's 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.

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.

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.

Section 6

Types of Abuse or Concern

Any type of abuse or concern should be raised following the reporting procedures laid out in this policy. In some instances further action will be required and that has been laid out under each type of abuse or concern. The DSL will support you with any further action you need to take.

1. Physical abuse

This includes hitting, pushing, burning, punching, slapping and any other type of physical harm inflicted on a person.

2. 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

3. Sexual abuse

This involves forcing or enticing a learner 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

4. Neglect

This is the persistent failure to meet a learners 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.

5. 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.

6. 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.

7. 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.

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

8. Forced Marriage

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.

9. 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.

10. 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 behavior 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

All cases of suspected FGM must be reported to the police by the person who has been made aware. The DSL should still be informed using the usual reporting procedures.

- Listen to the child
- Contact Careline and the police without delay
- 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

11. Bullying

Staff should be mindful of the threat of bullying. All learners are vulnerable to bullying, which is deliberately hurtful and harmful behavior, 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 learners 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.

12. Peer on Peer abuse

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 inappropriately touched by boys).

Peer on peer abuse should be addressed as a safeguarding concern.

Child on child sexual violence or harassment

One form of peer on peer abuse is child on child sexual violence or harassment. It is the responsibility of MTL to respond to all reports and concerns relating to learner on learner sexual violence or harassment, including those that take place off the premises and or online.

All forms of this abuse should be taken seriously but it is important to remember that it is more likely that girls will be the victim of abuse perpetrated by boys.

When a report is being made by a learner, the following action should be taken:

- Two members of staff should be present, one being the DSL if possible
- Staff should not view or forward any illegal images of the learner if there is an online element to the report. You may need to confiscate the device for police evidence
- Ensure the learner knows you are taking the allegations seriously
- Do not promise confidentiality
- Be aware of learners barriers to disclosing information
- Listen carefully and do not ask leading questions. You can ask if they have been harmed and how they were harmed
- Record facts and not opinion in any written records
- Inform the DSL as soon as practically possible and follow this up with a My Concern report

The safeguarding team will make any decisions relating to further action, assessing any risk and liaising with the necessary safeguarding partners and agencies. The wishes of the victim will be considered but this will be balanced with the need to protect all learners.

13. Sexting

Sexting involving those under the age of 18 must always be referred to a Designated Person. 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.

Staff should never view or forward any illegal images of a learner when a report is being made or investigated. If necessary, the mobile device should be confiscated for police evidence.

14. Radicalisation and Extremism

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 learners 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

15. 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.

What you should do:

- If the concern is relating to a learner at MTL, you should inform the DSL using the normal reporting procedures who will support you in making any reports to police
- 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 [h https://www.modernslaveryhelpline.org/report](https://www.modernslaveryhelpline.org/report)
 - 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>

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

16. Fabricated Induced Illness

Fabricated induced illness is a clinical situation in which a child is, or is very likely to be, harmed due to parental behaviour and action, carried out in order to convince doctors that the child's state of physical and/or mental health or neurodevelopment is impaired or more impaired than is actually the case.

Some possible signs to look out for are:

- Reporting symptoms that are not explained by a medical condition
- Reporting a diagnosis has been made when this is not true
- Missed medical appointments
- Partial or non-attendance or the use of unnecessary aids
- New symptoms once the initial symptoms have been resolved
- The learners daily and life activities being limited beyond what is expected due to any disorder the learner may have
- The parent/carer expressing concern they are under suspicion of FII or relatives raising concerns about FII

17. Private Fostering

Private fostering is a private arrangement between a parent and carer. When a child under 16 (or 18 if disabled) is cared for and provided with accommodation, by an adult who is not a relative, for 28 days or more, it is known as private fostering.

Where a member of staff becomes aware of a potential private fostering arrangement, a safeguarding report should be made to the safeguarding team. The safeguarding team will make contact with the family to ensure this has been reported to children's social care.

Section 7

Wider Safeguarding Responsibilities of Staff

1. Radicalisation and extremism

Any prejudice, discrimination or extremist views, including derogatory language displayed by employees or learners 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 learners 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
- Learners accessing extremist material online, including through social networking sites
- Parental reports of changes in behaviour, friendships or actions and requests for our assistance
- Learners 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, that suggest that a learner supports terrorism and/or extremism, must be reported to the DSL immediately in line with MTL reporting concerns procedure

MTL will follow any local agreed procedure as set out by Local Authority and/or Local Safeguarding Children's Board's.

2. 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 learners 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 learners through extreme or narrow views of faith, religion, culture or other ideologies
- Activities are matched to the needs of learners
- Activities are carefully evaluated to ensure they are effective

We recognise it is within our culture to encourage learners 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 learners can recognise risk and build resilience to manage any such risk themselves whilst also encouraging learners to develop critical thinking skills needed to engage in informed debate.

3. Learners' awareness of Safeguarding and Extremist Views

- All learners 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 learners 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 learners are made aware of methods to report concerns to ensure opportunities are not missed

4. Whistle Blowing

Where there are concerns of extremism or radicalization, learners and employees will be encouraged to raise any issue in confidence by fully utilising MTL whistle blowing policy and procedures.

5. Training

- Designated safeguarding officers will receive regular 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 learners are given adequate safeguarding/radicalisation awareness in line with their age and ability.

Section 8

Online Safety

MTL have outlined how training and support is offered to learners and staff, in relation to online safety, in the Online Safety Charter. There is also an Acceptable Use of ICT Policy and an Online Safety Agreement signed by all learners.

Online filtering is used to restrict the access of learners and staff to harmful content and the use of ICT is monitored to ensure it is not used in a way that is harmful to learners.

Staff will be provided with training regarding online filtering and monitoring and regular spot checks will be completed to ensure this is working appropriately.

Section 9

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. This will inform them of the expectations and responsibilities placed upon them in relation to safeguarding
- 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 visitor's badge

Section 10

Signatures and Review

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 Carney – Company Director in conjunction with Emma Sinnett and Amanda Clarke

Signatures

Signed: *D Carney*

Dated: 09/01/2024

Debbie Carney
Company Director

Signed: *E Sinnett*

Dated: 09/01/2024

Emma Sinnett
Designated Safeguarding Lead

Signed: *A Clarke*

Dated: 09/01/2024

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 the policy Amended Useful Contacts: Liverpool Safeguarding Children Board changed to Liverpool Safeguarding Children Partnership website address updated Added in Merseyside Adult Safeguarding Board details
04/10/2021	Emma Sinnett	The policy has had significant changes to the format and content and should be read in full.
03/10/2022	Emma Sinnett	No changes in policy remains fit for purpose Additional named Deputy DSL added Kate Neville following achievement of Level 3 Safeguarding
03/02/2023	Debbie Carney	Kelly Clark Deputy DSL responsible for reporting any concerns to LADO if allegation against a family member of Debbie Carney has now left Mode – replaced any reference to Kelly Clark with Kate Neville

		Updated LADO details to Mark Godard
09/01/2024	Emma Sinnett	Policy has been reviewed to make the wording more succinct, general content remains the same Kate Neville LADO link replaced with Michael Flood
12/03/2024	Emma Tagoe	Sections added for private fostering and fabricated induced illness.

Annex A

Support for Learners and Staff

Learners and staff can approach the DSL, DDSL or the learner support mentor when they feel they need support. The MTL website also contains a list of support contacts for learners and staff.

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
Mark Godard LADO Risk Manager 0151 233 0844
0771 671 2034
Pauline Trubshaw Deputy LADO 0151 233 0846
0784 172 7309
0151 225 8101

The Liverpool Safeguarding Team 0151 737 1999
Contact: Alex Leith /Carolyn Welsh
aleith@nspcc.org.uk
cwelsh@nspcc.org.uk

LADO contacts for the other 5 local authorities across Liverpool City Region

[Knowsley Council LADO](#)
[Sefton Council LADO](#)
[Wirral Council LADO](#)
[St Helens Council LADO](#)
[Halton Council LADO](#)

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

FGM Support

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/>

Preventing Radicalisation and Extremism 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

Section 11

Policy Communication and Consultation

Where possible, this policy has been written in conjunction with staff, learners and employers feedback.

Staff should sign below once you have read and understood the policy. You should provide any feedback immediately to the producer of the policy, if you feel any changes should be considered. This can be done by internal e-mail.

Name	Date	I have read and understood this policy Y/N	Signature
Les Calvert			
Debbie Carney			
Amanda Clarke			
Mike Chatterton			
Louisa Fay			
Michael Flood			
Kelly Coughlin			
Alan Robinson			
Emma Sinnett			
Wesley Tagoe			
Summer Waters			
Zara Worswick			