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. Definition of Safeguarding
3. Associated policies and documents

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 training
3. Rules and expectations for staff and volunteers
4. Safeguarding awareness for learners

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. Considerations when making a report
    a. Extra familial harms
    b. Mental Health and possible links to Safeguarding and Child Protection
    c. Learners with a social worker
    d. Attendance
    e. Learners missing from education
    f. Learners with SEND, disabilities or health conditions

Family Help and support before statutory intervention
Young carers
Prejudice-based harm

3. How to make a report
4. Responding to a learner who makes a report

5. Actions where there are concerns about a child
6. Concerns or allegations about staff, volunteers and contractors

Low-level concerns about adults

Section 6

Types of Abuse or Concern

1. Physical
2. Emotional
3. Sexual
4. Neglect
5. Domestic Abuse
6. Operation Encompass
7. Discriminatory Abuse
8. Forced Marriage
9. Arranged Marriage
10. Honour or faith-based abuse
    a. Once Chance Rule
11. **Female Genital Mutilation (FGM)**
12. Bullying
13. Child-on-child abuse (including harassment and violence)
14. Child-on-child sexual harassment and sexual violence
15. Child Sexual Exploitation (CSE)
16. Making or sharing nudes and semi-nudes, including AI-generated imagery
17. Gender-based violence
18. Criminal Child Exploitation
19. Gangs and county lines
20. Radicalisation and extremism
21. Modern Slavery Human Trafficking
22. Fabricated Induced Illness
23. 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

1. Online Safety
    a. Misinformation
    b. Disinformation
    c. Conspiracy Theories
    d. Staff training
    e. Learner education
    f. Reporting and intervention

Section 9

1. Visitor Arrangements
2. Alternative Education Support Mentors

Section 10

Signatures and Review

Annex A

Support for learners and staff

Annex B

Prevent referral process

Section 1

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.

MTL will comply with all applicable regulations including Keeping Children Safe in Education (KCSiE) and all relevant legislation.

Definition of Safeguarding
KCSiE 2026

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

Associated polices and documents

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

- Keeping Children Safe in Education (KCSiE) 2026 - Part one and Annex A for staff working directly with children
  Working Together to Safeguard Children
  Information sharing advice for safeguarding practitioners and current local safeguarding

partnership procedures

- 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

Section 2

Roles and Responsibilities

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

Designated Safeguarding lead (DSL) is:

Amanda Clarke amanda@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

Deputy Designated Safeguarding Lead is:

Emma Tagoe emma@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

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 Part one of Keeping Children Safe in Education in full. Staff who work directly with children should also read Annex A.
- 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 that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator, can happen on or off site and online, and is preventable through early identification and appropriate support.
- Understand that some children may be at greater risk of harm, including children with SEND or health conditions, young carers, children with a social worker, children in Alternative Provision and children affected by prejudice-based harm.

Please note that in the event of an allegation made against Debbie Carney – Director or a member of her family, Michael Flood is responsible for reporting to LADO – mflood@modetraining.co.uk

Section 3

Recruitment and training of staff and partners
Safer recruitment

Procedures for recruitment of staff are outlined in the Safer Recruitment Policy. MTL will follow Part three of KCSiE 2026 and complete the appropriate pre-appointment checks for staff, volunteers, contractors and other adults working with learners. The 2026 changes to regulated activity, including the removal of the previous supervision exemption for volunteers, will be applied when deciding the level of DBS and barred list checks required. MTL will also meet its legal duty to make referrals to the DBS where the referral criteria are met.

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
  Understanding Family Help, local thresholds and when a referral to statutory services may be required
  Online safety, including staff roles in filtering and monitoring and risks associated with generative AI
  Recognising prejudice-based harm, child-on-child abuse and overlapping safeguarding risks

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

Rules and expectations for staff and volunteers

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 you use 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

Safeguarding awareness for learners

Young people and vulnerable adults at Mode are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individuals, including those who are victims of abuse, and those with special educational needs or disabilities.

Section 4

Reporting Concerns – Guidance for Learners

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.

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 deputy:

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

If there is an allegation against the company director or one of her family members, Michael Flood is the contact:

Michael Flood	mflood@modetraining.co.uk	0151 709 4640

Section 5

Reporting Concerns – Guidance for staff

Staff should share any concerns they have about a learner with the Designated Safeguarding Lead. However, it should be remembered 'that sometimes they will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful…This should not prevent staff from having a professional curiosity and [speak] to the DSL'.

What if DSL is not available

If the DSL is not available and you need to speak with them, you should contact the DDSL if they are not available you should contact a senior leader or the most senior member of staff.and/or take advice from local children's social care. The DSL should be informed as soon as possible.

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

Considerations when making a report

Extra-familial harms

All staff, but especially the DSL and deputies, should consider whether children are at risk of abuse or exploitation outside their families. Extra-familial harms can include sexual abuse and exploitation, teenage relationship abuse including physical, sexual and emotional abuse and stalking, criminal exploitation including financial exploitation, serious youth violence, county lines and radicalisation. Staff should remember that different forms of harm often overlap and may occur both online and offline.

Mental health and possible links to Safeguarding and Child Protection

All staff at Mode are aware that mental health needs can affect a learner's safety, welfare, attendance, behaviour and ability to engage in education. In some cases, a mental health concern may also be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff are not expected to diagnose mental health conditions. They should notice changes in presentation or behaviour, listen to the learner, consider what may be happening around them and share concerns with the DSL or DDSL. Safeguarding action must not be delayed because a concern is being viewed only as a mental health issue.

Where a mental health concern is also a safeguarding concern, immediate action must be taken through My Concern and/or direct discussion with the DSL or DDSL. MTL will consider appropriate internal support, Family Help or referral to statutory services depending on the level of need and risk.

Learners with a Social Worker

We recognise that when a learner has a social worker, it is an indicator that they are more at risk than most learners. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support learners who have a social worker.

Attendance

Knowing where learners are during education hours is an important aspect of safeguarding. Unexplained, repeated or prolonged absence can be an indicator of abuse, neglect, exploitation, mental health need or other safeguarding concerns, including child criminal exploitation.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers/schools/employers when learners do not attend. This means we need to have at least two up to date contacts numbers for parents/carers. Parents should remember to update us as soon as possible if the numbers change.

In response to the guidance in Keeping Children Safe in Education (2026) Mode have:

1. A clear attendance policy which all staff fully understand and adhere to
2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.

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.

Learners with SEND, disabilities or health conditions

Learners with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. The safeguarding team at MTL have ensured our policies reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to their condition without further exploration;
- May be more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners;
- The potential for learners with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in managing or reporting these challenges;
  Risk that the learner may not understand that what is happening to them is abuse;
  Greater dependence on adults for care or the need for intimate/personal care;
  Isolation from peers or other trusted adults; and
  Difficulties with cognitive understanding, including distinguishing fact from fiction in online content and understanding the consequences of repeating online content or behaviours.

At MTL we provide additional support for this group of learners ensuring any appropriate support for communication is in place.

Family Help and support before statutory intervention
Any learner may benefit from support before statutory intervention. Staff should be alert to emerging needs and discuss them with the DSL or DDSL. Depending on the circumstances, support may be provided through universal or community-based early help, a targeted Family Help assessment, internal support, or referral to statutory services. MTL will follow local safeguarding partnership thresholds and assessment protocols and will work with children's social care and other agencies when required.

Young carers
MTL recognises that caring responsibilities can affect a young person's attendance, attainment, behaviour and wellbeing. Staff should identify concerns early and raise them with the safeguarding team so that appropriate internal, local authority, health or other partner support can be considered.

Prejudice-based harm
Staff should recognise that racism, faith-targeted abuse and other forms of prejudice or discrimination can significantly affect a learner's welfare, wellbeing, mental health and willingness to seek help. Concerns about prejudice-based harm must be challenged and considered within safeguarding practice where appropriate.

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.

Responding to a learner who makes a disclosure

If a learner makes a disclosure, the member of staff should:

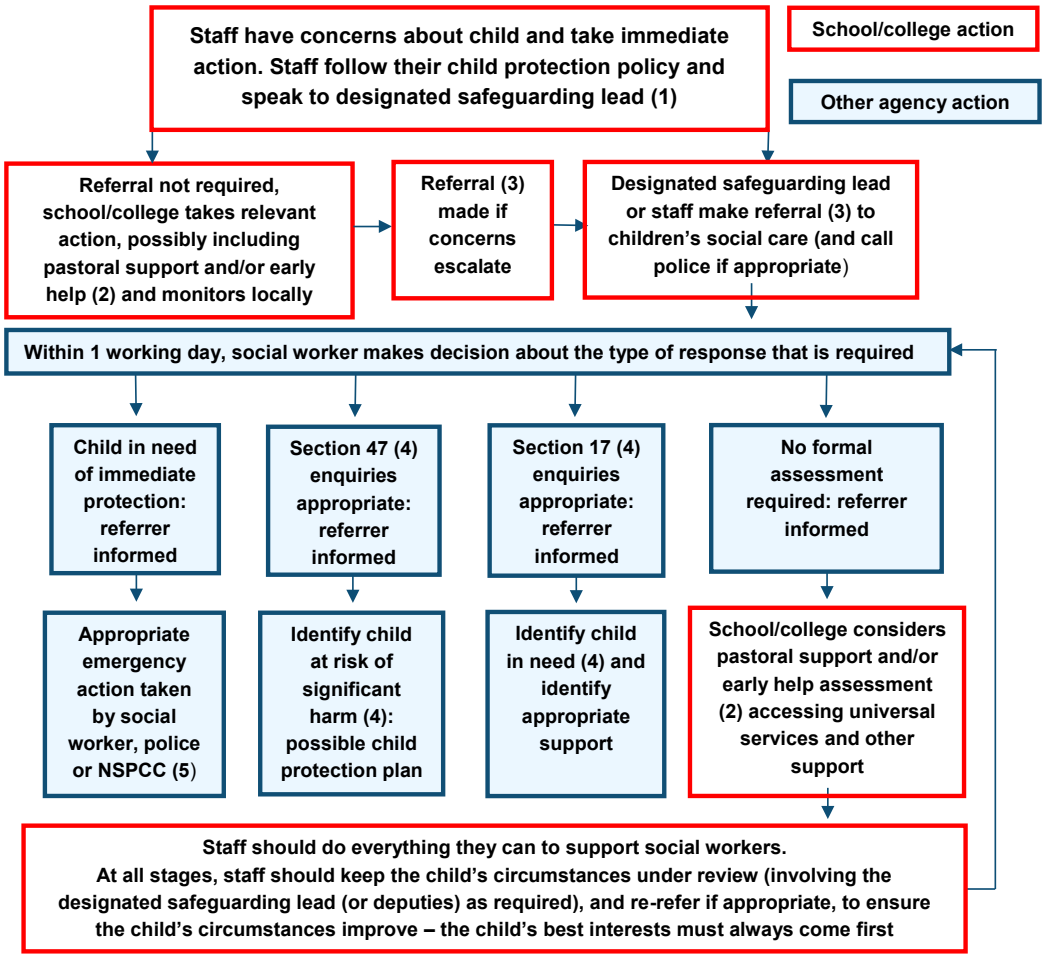
- Try to react calmly, never ever go and get another person to listen to the disclosure instead of you, there is a reason this learner has chosen you to make the disclosure to
- Remember the learner will be anxious or frightened and even intimidated
- Reassure the learner that they are being taken seriously, will be supported and kept safe. They should never be made to feel that they are creating a problem or feel ashamed for making a report.

- 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



Safeguarding concerns or allegations about staff, volunteers and contractors

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:

- Any safeguarding concern or allegation that may meet the harm threshold should be reported immediately to the Company Director and DSL. Where there is doubt about whether the harm threshold is met, advice should be sought from the LADO.
- 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
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 / Teaching Regulation Agency, where applicable any teacher because of serious misconduct in line with Keeping Children Safe in Education.
The provider will only include safeguarding concerns or allegations in references where this is permitted and appropriate under KCSiE 2026, including substantiated concerns that meet the harm

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.

Low-level concerns about adults

MTL promotes an open and transparent culture in which all concerns about adults working in or on behalf of MTL, including staff, volunteers, contractors and visiting professionals, are shared promptly and appropriately. A low-level concern is a concern about behaviour that is inconsistent with the staff code of conduct, including inappropriate conduct outside work, but does not meet the harm threshold.

Low-level concerns should be reported to the Company Director and DSL and recorded in writing. The record will include the concern, the context in which it arose and the action taken. Records will be kept confidential and secure and reviewed to identify patterns of inappropriate, problematic or concerning behaviour.

Where a pattern of behaviour is identified, MTL will consider appropriate action under its staff conduct or disciplinary procedures and whether there are wider cultural or training issues that need to be addressed. If there is any doubt that a concern may meet the harm threshold, or a pattern escalates to that threshold, the LADO will be consulted.

Concerns relating to supply staff, contractors or other adults employed by a third party will also be shared with their employer so that patterns can be identified and appropriate action taken.

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.

Physical abuse

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

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child or young person which can cause severe and adverse effects on emotional development. It can include persistent criticism, belittling or name-calling, conveying that they are worthless or unloved, silencing them, imposing inappropriate expectations, serious bullying or exposing them to the ill-treatment of others.

Sexual abuse

Sexual abuse involves forcing, causing or inciting a child or young person to take part in sexual activities, whether or not they are aware of what is happening. It can involve contact and non-contact activity, can take place online or offline, and technology can be used to facilitate abuse. Sexual abuse can be perpetrated by adults or other children and young people.

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 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.

Domestic abuse

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- physical or sexual abuse;
- violent or threatening behaviour;
- controlling or coercive behaviour;
- economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the

effects of, the abuse; and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Operation Encompass
Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8am to 1pm, Monday to Friday on 0204 513 9990 (charged at local rate).

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.

Forced Marriage
Forced Marriage (FM) is a cultural phenomenon and can affect any communities. Forced marriage is a marriage conducted without the valid consent of one or both parties, where some element of duress is a factor. 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.

Honour or faith-based abuse
Honour Based Violence (HBV) is a cultural phenomenon and can affect any communities 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.

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

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.

Child-on-child abuse (including harassment and violence)
All staff should be aware that children can abuse other children and that this can happen inside or outside MTL and online. MTL maintains an attitude of "it could happen here". The absence of reports does not mean that child-on-child abuse is not happening.

Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. It is preventable, and early recognition of harmful behaviour and timely evidence-based support can help prevent escalation. Inappropriate or abusive behaviour must never be dismissed as “banter”, “having a laugh”, “part of growing up” or similar.
Child-on-child abuse can include bullying and cyberbullying, prejudice-based and discriminatory abuse, abuse in intimate relationships, physical assault or threats involving weapons, sexual violence, sexual harassment, harmful sexual behaviour, consensual or non-consensual making or sharing of nudes and semi-nudes, upskirting and initiation or hazing type violence and rituals.
All concerns must be reported to the DSL or DDSL. MTL will consider the needs and safety of all children involved, including the victim and alleged perpetrator, and will take action in line with Part five of KCSiE 2026 and local safeguarding procedures.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact of all forms of domestic abuse, including where they see, hear or experience its effects.

Child-on-child abuse should always be addressed as a safeguarding concern.

Child-on-child sexual harassment and sexual violence

One form of child-on-child abuse is child on child sexual violence or harassment. It is the repsoibility 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
- Records 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.

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.

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicions of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

Potential vulnerabilities include:
Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity

Making or sharing nudes and semi-nudes, including AI-generated imagery

The making or sharing of nudes and semi-nudes refers to the creation, sending or posting of nude or semi-nude images by young people under 18. Images include photographs, videos and livestreams and may be self-generated, created by another person, digitally altered or wholly generated using artificial intelligence, including deepfakes or “deep nudes”.
All incidents involving the making or sharing of nudes or semi-nudes require a safeguarding response, whether the image sharing is described as consensual or non-consensual. The concern must be referred immediately to the DSL or DDSL.
Staff must not intentionally view, copy, print, forward or save a nude or semi-nude image of a child unless specifically required and authorised as part of a safeguarding response. The DSL will follow current UKCIS/KCSiE guidance and seek police or children’s social care advice where appropriate.

Gender-based violence

Definition of gender-based violence

Gender-based violence refers to any type of harm that is perpetrated against a person or group of people because of their factual or perceived sex, gender, sexual orientation and/or gender identity. It is based on an imbalance of power and is carried out with the intention to humiliate and make a person or group of people feel inferior and/or subordinate.

This type of violence is deeply rooted in the social and cultural structures, norms and values that govern society, and is often perpetuated by a culture of denial and silence. Gender-based violence can happen in both the private and public spheres, and it affects women and girls disproportionately.

Spot the signs

- aggression;
- non-compliance at school;
- difficulty concentrating;
- difficulty developing relationships;
- reduction in attendance and/or attainment;
- eating disorders;
- low self-esteem, depression or anxiety;
- self-harm;
- substance misuse.

What to do

Create an environment based on equality and informed choice by:

- promoting equality;
- avoiding stereotyping and dispelling societal gender stereotypes;
- embracing difference;
- demonstrating tolerance;
- promoting equality of opportunity across the curriculum;
- tackling any gender bias-based language, assumptions;
- addressing gender-based bullying or harassment swiftly.
- check young people have safe relationships – in their family, with their peers and with your staff.
- create the environment where it's okay to talk even about the most difficult things.
- Know the signs and know what to do – use the checklists above, and follow Mode safeguarding procedures and be confident in raising gender-based violence as a possibility.
- Remember, although the highest proportion of GBV is against women and girls, boys and men also suffer.

Criminal Child Exploitation

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat

of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

Some of the following can be indicators of CCE are children who:

- Appear with unexplained gifts or new possessions
- Associate with other young people involved in exploitation
- Suffer from changes in emotional well-being
- Misuse drugs and alcohol
- Go missing for periods of time or regularly come home late and
- Regularly miss school or education or do not take part in education

Gangs and County Lines

Definition of a gang: A gang is a relatively durable, predominantly street-based group of young people who see themselves (and are seen by others) as a discernible group and engage in a range of criminal activity and violence. They may also identify with or lay claim over territory, have some form of identifying structure feature, and/or are in conflict with other, similar gangs.

Over recent years, there has been continuing concern about knife crime. Youth violence is also linked to county lines. Children are increasingly being targeted and recruited online by county lines gangs using social media.

County lines: is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".'

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Additional vulnerabilities

Any child or young person may become involved in gangs and youth violence. However, certain groups may be more vulnerable, including those experiencing:

- a chaotic home life where children are not a priority;
- poor supervision from an early age;
- issues within the home (e.g., domestic abuse, mental ill-health);
- a familial history of offending;
- additional needs;
- poor engagement with education or have been permanently excluded from school;
- poor self-image/self-esteem;

- being in care.

Reasons for joining a gang

Children and young people may join a gang for several reasons, including:

- the need for a sense of belonging and purpose;
- to gain respect, status or power;
- for protection;
- being recruited by other gang members;
- being pressured to join;
- boredom;
- poverty;
- feeling they will not find a better life or good job;
- financial gain (legal or otherwise).

Spot the signs

Possible indicators include:

- aggression and/or non-compliance;
- difficulty concentrating;
- difficulty developing relationships;
- reduction in attendance and/or attainment, going missing;
- poor self-esteem, depression or anxiety;
- self-harm;
- substance misuse;
- changes in behaviour and appearance;
- unexplained possessions;
- refusal to enter certain areas;
- a new nickname or starts to use tags/graffiti on books/possessions

What to do

- Create an environment based on equality and informed choice – provide information to allow young people to make informed choices. It's well established that success in learning is one of the most powerful factors in the prevention of youth crime.
- Check young people have safe relationships – in their family, with their peers and with your staff. Create an environment where it's okay to talk even about the most difficult things.
- Contextual approach – be aware of the risks to children and young people in your local area concerning gangs and youth violence.
- Multi-agency working – collaborate with the police, local government, youth offending teams, and health and probation services, to share data and information. Jointly create plans to prevent and reduce serious violence within local communities.
- Know the signs and know what to do – use the checklists above, Mode safeguarding procedures and be confident in raising gang and youth violence as a possibility.
- Take action – and keep taking action until you know children and young people are safe, by following procedures set out in this policy.
-

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 knowledge skills and critical thinking skills to challenge and debate in an informed manner. Learners will be referred to channel if we feel they are at risk of harming themselves or others. (see Annexe B)

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

1.0. 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

0. overt new religious practices
1. prone to outbursts
2. other changes in behaviour associated with neglect and a change in someone's emotional wellbeing

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 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

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

Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Where a member of staff becomes aware of potential private fostering arrangement, a safeguarding report should be made to the safeguarding team. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the local authority. Mode itself has a duty to inform the local authority of the private fostering arrangements.

Section 7

Wider Safeguarding Responsibilities of Staff

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.

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.

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

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.

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

0. 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 considers online safety through the four broad areas of risk: content, contact, conduct and commerce. Online risks can include harmful or misleading content, unsafe contact with others, harmful conduct such as bullying or the making/sharing of explicit images including AI-generated images, and commercial risks such as scams, phishing, inappropriate advertising and online gambling. Where generative AI is used in education or training, MTL will consider safeguarding, data protection, ethics, age-appropriateness and the risk of harmful or manipulated content. Learners and staff will be supported to use AI safely and responsibly.

MTL provides training and support for learners and staff on online safety, as outlined in the E-Safety Policy. All learners are also required to sign an Online Safety Agreement.

To protect against harmful online content, MTL uses appropriate filtering and monitoring systems on its devices and networks. Roles and responsibilities for filtering and monitoring will be clearly assigned. The effectiveness of the provision will be reviewed at least once every academic year by the responsible senior leader with support from the DSL and IT support. Checks will include whether filtering is working appropriately on internet-connected devices in relevant locations, and a record of the checks and any actions will be retained.

MTL recognises that learners may encounter a wide range of online risks, including misinformation, disinformation, and conspiracy theories. These can undermine trust, encourage harmful ideologies, promote extremist views, and lead to unsafe behaviours.

For this reason, online safety is treated as a core safeguarding responsibility and is addressed through staff training, learner education, and robust monitoring systems.

Misinformation, Disinformation and Conspiracy Theories

Misinformation

False or inaccurate information that is shared without intent to deceive.
Example: *A learner shares an incorrect statistic on social media, believing it to be true.*

Disinformation

False information that is created or shared deliberately to mislead, manipulate, or cause harm.
Example*: Online groups spreading false medical advice to discourage vaccinations*.

Conspiracy Theories

Narratives or beliefs that suggest powerful groups are secretly controlling events, often without credible evidence. These theories can foster mistrust, fear, or extremist views.
Example*: Claims that global events are secretly orchestrated by governments or organisations*.

Staff Training

All staff will receive annual training on online safety, which includes identifying and responding to misinformation, disinformation, and conspiracy theories. Staff will be trained to understand how these issues can intersect with safeguarding concerns such as radicalisation, extremism, bullying, exploitation, and mental health. Staff are expected to model safe online behaviour and promote critical evaluation of online information in their practice.

Learner education
Learners will be taught to critically evaluate online information, distinguish between reliable and unreliable sources, and understand the risks posed by misinformation, disinformation, and conspiracy theories. This includes building digital resilience, developing critical thinking skills, and encouraging learners to seek support when they encounter harmful or confusing content online. This education will form part of our safeguarding, Prevent, and personal development curriculum.

Reporting and Intervention
Any concerns that a learner is being harmed, influenced, or placed at risk by misinformation, disinformation, or conspiracy theories must be reported immediately to the Designated Safeguarding Lead (DSL). Where appropriate, referrals will be made to external agencies, including Prevent, CEOP, or children's social care. All incidents will be recorded and monitored in line with safeguarding procedures.

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

Alternative Provision and Education Support Mentors
Where MTL provides Alternative Provision for a school, MTL recognises the additional safeguarding vulnerability of this cohort and will work with the commissioning school to ensure the placement remains safe and suitable for the individual learner. MTL will provide written assurance that appropriate safeguarding checks have been completed on relevant staff and will inform the commissioning school of changes that may affect safeguarding assurance, including relevant staffing or delivery-site changes.
MTL will provide accurate information about where the learner is based during education hours, including any agreed satellite or subcontracted location. MTL will support regular placement reviews and will immediately raise any safeguarding concern with the commissioning school and relevant safeguarding partners. Where a placement is no longer safe or suitable, this will be escalated without delay.

From time to time support mentors attend MTL with learners from their school. This is to either support with transition from school to attending MTL or to support learners who have SEND, Mental Health support needs, are looked after or have a history of being a runaway.

As these mentors are not employed by MTL and are likely to be in classes with young people not from their schools we take the following precautions.

-
- Request from the school a letter stating they receive ongoing safeguarding training and registered on the school SCR following an enhanced DBS.
- Ensure they are given the MTL safeguarding leaflet on day one and verbally talked through our reporting process if they have have any concerns or a young person discloses to them

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 Tagoe and Amanda Clarke. This version has been reviewed against Keeping Children Safe in Education 2026, effective September 2026.

Signed: 

Debbie Carney Company Director **4th September 2026**

Signed: 

Emma Tagoe Centre Manager **4th September 2026**

Signed: 

Amanda Clarke DSL **4th September 2026**

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 Tagoe	The policy has had significant changes to the format and content and should be read in full.
03/10/2022	Emma Tagoe	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 Tagoe	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	Emma Sinnett name change to Emma Tagoe Sections added for private fostering and fabricated induced illness. LADO details changed to include all LA's and link to page due to frequent name changes of LADO names removed and link added
30/09/2024	Debbie Carney	Michael Flood replaces Wesley Tagoe as a DDSL Sections added Serious Youth Violence Gangs Gender-based violence Amanda Clarke DSL Emma Tagoe became DDSL
25/09/2025	Debbie Carney	Contents list updated Section 1 – Definition of Safeguarding added Section 5 – Extra Familial Harms, Mental Health and possible links to safeguarding concerns, learners with a social worker, attendance and learners with SEND all added What if DSL is not available Section 6 – Domestic abuse strengthened and operation compass added County lines strengthened Private fostering strengthened including our legal responsibility to report Section 8 – Online safety re written Misinformation, Disinformation and Conspiracy theories added Staff Training for online safety, learner education and reporting and intervention added Emma Tagoe job title changed to Centre Manager
04/09/2026	Debbie Carney / Amanda Clarke	Reviewed against KCSiE 2026. Updated Part one reading expectations; Family Help and support before statutory intervention; prejudice-based harm; young carers; SEND/health barriers; extra-familial harm including stalking and financial exploitation; child-on-child abuse terminology and response; making/sharing nudes and semi-nudes including AI-generated imagery; online safety, generative AI and annual filtering/monitoring review; Alternative Provision safeguarding assurance; safer recruitment changes to regulated activity/volunteers; and low-level concerns about adults.

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

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

LADO contacts for 6 local authorities across Liverpool City Region

Please note some Local Authorities can change their links in year, if this is the case you can search the name of the LA followed by LADO for most updated information.

Liverpool Council LADO
Knowsley Council LADO
Sefton Council LADO
Wirral Council LADO
St Helens Council LADO
Halton Council LADO

Family Help / Early Help contacts

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 www.ceop.gov.uk	0870 000 3344
Channel Special.Branch@merseyside.pnn.police.uk Subject of all emails should be: CHANNEL	0151 777 8505
Merseyside Police Prevent Engagement Team Darren.F.Taylor@merseyside.police.uk	0151 777 8311
Liverpool Local Authority Prevent Coordinator Clive.Finch@liverpool.gov.uk	0151 233 7015
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

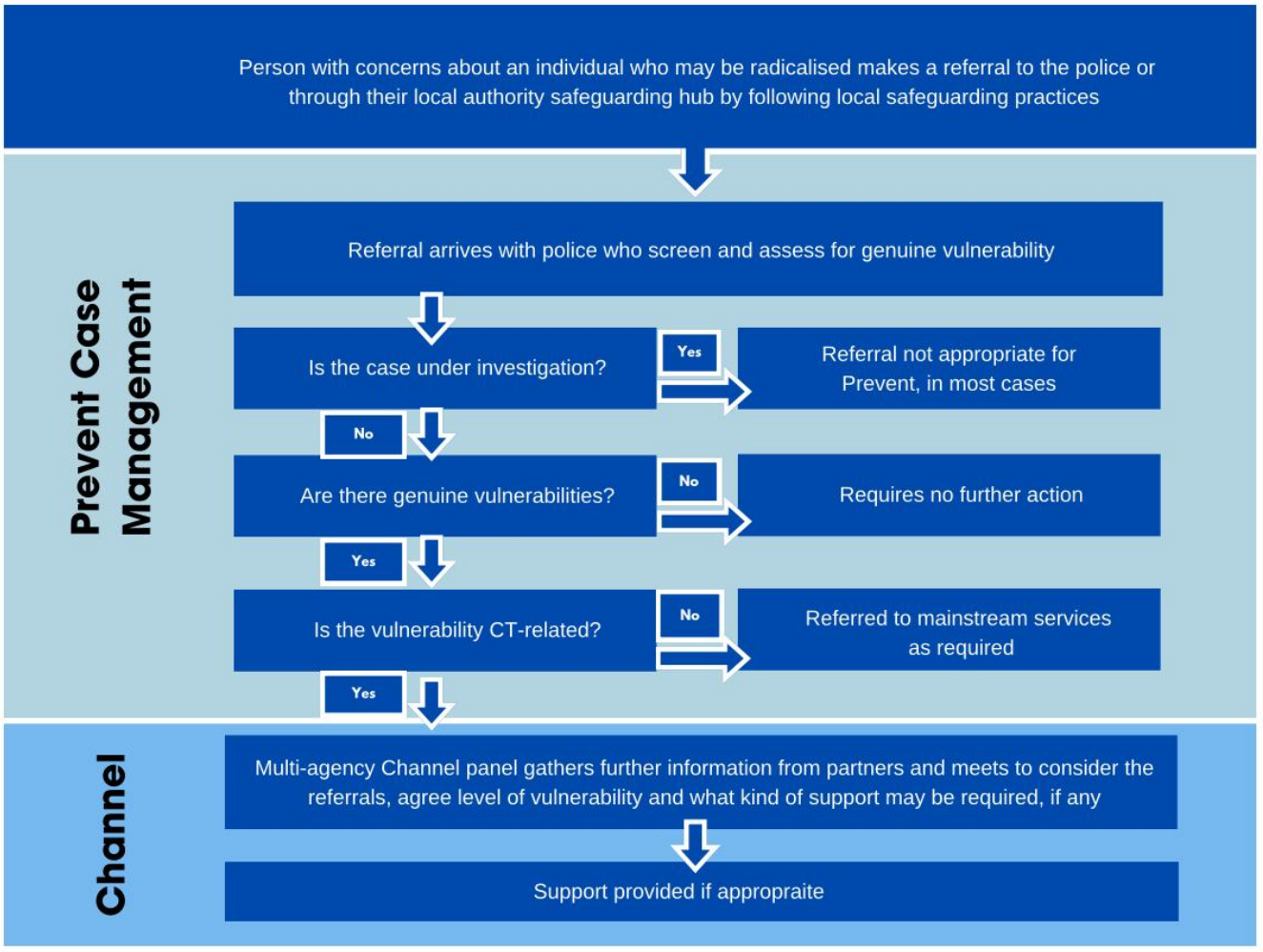
- Think u know website

Annex B

Referral process to prevent

If there is a concern about an individual who may be radicalised a referral will be made to the police through the local authority safeguarding hub. This will follow the national guidance -

https://www.gov.uk/guidance/making-a-referral-to-prevent



Prevent referral process