



## Inspiring Great British Manufacturing

# Safeguarding Policy

Policy owner: Quality Enhancement, Compliance and Systems Manager

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## 1. Introduction

MTC Training places the highest importance on safeguarding, and the safety and wellbeing of our learner is paramount in all activities. This policy sets out MTC Training's commitment to action in relation to its duty to safeguard and promote the wellbeing of learners.

### 1.1 Our safeguarding policy

This policy applies to all colleagues, including senior managers and the board of governors, paid staff (including contractors), volunteers and sessional workers, agency staff, students or anyone working on behalf of or with MTC Training.

### 1.2 The purpose of this policy is:

- To protect children, young people and vulnerable adults (hereafter referred to as 'learners') who receive MTC Training's services.
- To provide colleagues with the overarching principles that guide our approach to safeguarding and child protection.

MTC Training believes that learners should never experience abuse of any kind. We have a responsibility to promote the welfare of all learners to keep them safe.

Safeguarding incidents and/or behaviours can be associated with factors outside MTC Training and can also occur between learners outside of MTC Training. All colleagues, but especially the Designated Safeguarding Lead (DSL), should be considering the context within which such incidents and/or behaviours occur. This is known as **contextual safeguarding**, which simply means assessments of learners should consider whether wider environmental factors are present in the learner's life that are a threat to their safety and/or welfare.

## 2. Communication, Training and CPD

2.1 This policy is reviewed annually and presented to the Safeguarding Board, Education Committee and MTC Training Board for approval. Once the policy is approved it is disseminated to MTC Training Colleagues by the DSL with a short quiz and policy acceptance form to confirm it has been accepted, read and understood.

- 2.2. The approved policy will be published on the BMS and communicated to colleagues via internal channels (business briefs, emails, team meetings, etc.). New colleagues will be made aware of this policy by their manager during the induction process.
- 2.3. MTC Training Colleagues will complete annual CPD sessions to refresh safeguarding procedures. This will include any amendments to the Keeping Children Safe in Education Act.
- 2.4. New colleagues joining MTC Training are required to complete the ETF online training courses on Safeguarding and Prevent. Further training is delivered throughout the probation period which is monitored and reviewed by the Designated Safeguarding Lead.

2.5 Learners (apprentices and HNC students) will be made aware of this policy during their induction and asked to confirm they have read and understood the contents in the *documents I have read* section in Pro Monitor. Any update of this policy will be set up on ProMonitor and learners will be asked to read and accept.

2.6 Learners under 18 years of age should inform their parents/legal guardians about this policy.

### 3. Definitions

**Children:** In England a child is defined as anyone who has not yet reached their 18<sup>th</sup> birthday. Child protection guidance points out that even if a child has reached 16 years of age and is:

- Living independently
- In further education
- A member of the armed forces
- In hospital; or
- In custody in the secure estate.

They are still legally children and should be given the same protection and entitlements as any other child (Department for Education 2018a).

**Young people:** Refers to someone who is over the school leaving age of 16 years of age and under 18 years of age.

Vulnerable adults: Refers to a person who is 18 years of age and over, who is or may be, unable to take care of him or herself, or take steps to protect him or herself from significant harm or exploitation.

## 4. Common Indicators of Safeguarding Concerns

- Self-deprecating
- Extreme fear
- Being isolated or withdrawn
- Seeking attention/being over familiar
- Self-harm
- Substance abuse
- Eating disorder
- Poor attendance and/or poor punctuality
- Anti-social behaviour
- Untreated medical problems
- Health problems associated with lack of basic facilities
- Bruises, black eyes, broken noses
- Chronic running away
- Missing education
- Missing from home or care
- Estranged from their family
- Poor mental health
- Thoughts or attempts at suicide
- Gang related associations
- Voicing extremist ideologies
- Significant changes to appearance.

## 5. Internal and External Policies and Legislation

### 5.1 Main policies, procedures and legislation

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely:

- 4.2.1. Children Acts 1989 and 2006
- 4.2.2. The Education Act 2011
- 4.2.3. The Education and Training (Welfare of Children) Act 2021
- 4.2.4. United Convention of the Rights of the Child Sept 1990
- 4.2.5. Data Protection Act 2018
- 4.2.6. Human Rights Act 1998
- 4.2.7. Sexual Offences Act 2003
- 4.2.8. Domestic Abuse Act 2021
- 4.2.9. What to do if you are worried a child is being abused (March 2015)
- 4.2.10. Keeping Children Safe in Education: Statutory guidance for schools and colleges (September 2022)
- 4.2.11. Sexual Violence and Sexual Harassment between children in schools and colleges (2021)
- 4.2.12. Counter-Terrorism and Security Act 2015
- 4.2.13. Revised *Prevent* Duty Guidance: for England and Wales (Home Office April 2021)
- 4.2.14. Working Together to Safeguard Children July 2018
- 4.2.15. Protection of Freedoms Act 2012
- 4.2.16. Children and Families Act 2014
- 4.2.17. Special Educational Needs and Disability (SEND) code of practice: 0-25 years – Statutory Guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government Jan 2015
- 4.2.18. Police Act 1997 (Protection of Vulnerable Adults) Regulations 2013
- 4.2.19. Safeguarding Vulnerable Groups Act 2006
- 4.2.20. Mental Capacity Act 2019
- 4.2.21. Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers; HM Government July 2018

## 5.2 Additional relevant policies and procedures

**This policy should be read alongside our policies and procedures on:**

- 4.2.22. Prevent Policy
- 4.2.23. Recruitment, induction and training
- 4.2.24. Safeguarding Procedures – Disclosures and Managing Allegations against Colleagues
- 4.2.25. Role of the designated safeguarding officer
- 4.2.26. Dealing with disclosures and concerns about learner
- 4.2.27. Recording and information sharing
- 4.2.28. Code of conduct for colleagues
- 4.2.29. Safer recruitment
- 4.2.30. E-safety
- 4.2.31. Anti-bullying
- 4.2.32. Complaints
- 4.2.33. Whistleblowing
- 4.2.34. Health and Safety
- 4.2.35. Training, supervision and support
- 4.2.36. Lone working policy and procedure
- 4.2.37. Quality assurance

## 5.3 Welfare

We recognise that:

- 4.2.38. The welfare of children and young people is paramount, as enshrined in the Children Acts 1989 and 2006.
- 4.2.39. All learners, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse.
- 4.2.40. Some learners are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- 4.2.41. Working in partnership with learners and their parents, carers and other agencies is essential in promoting learners' welfare.

## 6. Keeping Learners Safe

We will seek to keep learners safe, protect them and prevent abuse towards them by:

- Having an effective, up to date safeguarding policy, procedures and practices which are promoted to all learners, colleagues and employer partners working with and for MTC Training.
- Valuing learners, listening to and respecting them in all aspects of our work and training.
- Appointing a DSL for learners, Designated Safeguarding Officers and a Lead Governor for safeguarding to implement and monitor our safeguarding policy, procedure, and practices.
- Adopting child protection and safeguarding practices through recognised procedures and a code of conduct for colleagues and employer partners.
- Ensuring that we act swiftly if an allegation is made against a member of the MTC Training team or anyone else learners can come in contact with. There will either be a criminal investigation, and/or a disciplinary or misconduct investigation.
- Gaining commitment to the policy by providing effective management for colleagues and employer partners through supervision, support, training and quality assurance measures.
- Recruiting colleagues safely, ensuring all necessary safeguarding checks are made to protect learners from harm.
- Ensuring that we provide a safe physical environment for our learners and colleagues by applying effective health and safety measures in accordance with the law and regulatory guidance.
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedures to help deal effectively with any bullying that does arise.
- Developing and implementing an effective e-safety policy and related procedures to ensure learners are able to access online and virtual learning and information with appropriate protection.
- Adopting a system of online monitoring to ensure any inappropriate use of online resources by learners or colleagues is identified by the system and can be effectively managed.
- Carrying out filtering and monitoring of apprentices' internet use by our IT Team, with agreed 'flags' that may indicate vulnerabilities or worrying changes in behaviour being reported to the DSL for escalation.
- Developing an effective communication strategy using the appropriate method of communication for the audience, including leaflets, posters, one-to-one discussions and use of relevant social media to ensure a consistent message. This promotes the creation of a positive safeguarding culture, where learners feel they can disclose their concerns, will be

believed and appropriate action will be taken to protect them.

- Using our safeguarding procedures to share concerns and relevant information with appropriate agencies who need to know, and involving learners, parents, families and carers as appropriate.
- Sharing information about safeguarding and safeguarding good practice with learners, their families, colleagues and employer partners as appropriate.
- Ensuring that we have effective complaints and whistleblowing measures in place.
- Ensuring that the policy is accessible to all, including public access via our websites.
- Presenting and promoting the policy, practices, and procedures to all stakeholders, including employer partners and learners.
- Promoting the policy, processes and responsibilities as part of colleagues', learners' and employer partners' induction and training, including access to ongoing training and a clear process of how to raise concerns.
- Ensuring that all colleagues, employer partners and learners understand how to follow our documented process and procedures for raising, recording and investigating safeguarding concerns, and have access to simple instructions and diagrams which are displayed throughout the centres, online and within handbooks.
- Ensuring learners understand how to access support and guidance, for example via the DSL, Designated Safeguarding Officers, Well-being Champions, and through referral to external agencies where appropriate.
- Developing and delivering a comprehensive programme of contextualised safeguarding training to all colleagues and employer partners who are working with learners or for whom we are a training provider.
- Ensuring all colleagues complete regular comprehensive mandatory training, including how to promote and implement the policy and procedures, and fully understand their own responsibilities and as well as those of all stakeholders.
- Gaining commitment to the policy by ensuring that all learners working with the organisation, and their employers, remain engaged with the policy and safeguarding processes, including regular workplace reviews with learners and employer partners that include a continued focus on safeguarding and wellbeing.
- Maintaining accurate and detailed records of all safeguarding incidents and concerns via the Designated Safeguarding Lead (DSL), using a secure electronic system, and only sharing relevant information with appropriate individuals and organisations.
- Recording and storing information about safeguarding and welfare issues professionally and securely.
- Ensuring effective monitoring and governance of our safeguarding and well-being

procedures, practices and culture through our Strategic Safeguarding Board, which includes representatives from colleagues, employer partners and a member of the Governing Body.

- Ensuring that the Board of Governors and Strategic Safeguarding Board review the effectiveness of our safeguarding policy, practice, and procedures annually, in order to incorporate changes and updates in legislation and recommended practice.

## 7. Meeting digital and technology standards

7.1 MTC Training is responsible for providing a safe environment for learning online as per the Meeting digital and technology standards in schools and colleges set out by Department for Education.

7.2 The MTC Training Board has overall strategic responsibility for filtering and monitoring and has appointed a member of the senior leadership team and non-executive director, to be responsible for ensuring the technical requirements to meet the standard.

7.3 The senior leadership team are responsible for:

- Procuring filtering and monitoring systems
- Documenting decisions on what is blocked or allowed and why
- Reviewing the effectiveness of our provision
- Overseeing reports

They are also responsible for making sure all colleagues:

- Understand their role
- Are appropriately trained
- Follow policies, processes and procedures
- Act on reports and concerns

7.4 The DSL will work closely with the MTC IT Team on the day-to-day monitoring of online safety which includes:

- Filtering and monitoring reports
- Safeguarding concerns
- Checks to filtering and monitoring systems

7.5 The MTC IT Team have technical responsibility for:

- Maintaining filtering and monitoring systems
- Providing filtering and monitoring reports
- Completing actions following concerns or checks to systems

In addition:

- Identify risk

- Carry out reviews
- Carry out checks

7.6 Filtering and monitoring provision will be reviewed and documented annually. A review will be carried out more frequently if there is a safeguarding risk, a change to working practice or new technology is introduced.

7.7 Effective filtering systems need to block internet access to harmful sites and inappropriate content. It should not impact teaching and learning or restrict learners from learning how to stay safe.

## 8. Monitoring

8.1 This policy will be monitored and reviewed on an annual basis during the Safeguarding Board, Education Committee and MTC Training Board who will approve any amendments.

8.2 The Safeguarding Team, Safeguarding Board and Safeguarding Lead Non-Executive Director are responsible for monitoring all activities that are in scope withing this policy and making recommendations for improvement.

## 9. Responsibilities of Safeguarding Leads at MTC Training

### 8.1 Designated Safeguarding Lead (DSL)

MTC Training's DSL is the Apprentice Programme Quality Manager, who has been delegated the appropriate authority to enable them to complete the role.

The DSL has a key duty to take the lead responsibility for raising awareness within MTC Training of issues relating to the welfare of our learners and the promotion of a safe environment for individuals who are training within MTC Training. They will receive training in safeguarding and child protection issues and inter-agency working, as required by the Local Safeguarding Children's Partnership and will receive refresher training in accordance with their recommendations.

The DSL is also responsible for ensuring staff, visitors and learners have the correct security checks (DBS register), and for collating and interrogating the data to analyse and inform any necessary changes. These results are reported and scrutinised at Senior Management level via a Risk Register that is reviewed at quarterly AMTC Board Meetings, with Safeguarding Board Meetings held on a quarterly basis to ensure continuous improvement. This ensures that commitment to the

policy is demonstrated at all levels of the organisation.

The DSL will be expected to:

- Oversee the referral of cases of suspected abuse or allegations to Social Care Services.
- Oversee the referral of cases to the Channel programme where there is a radicalisation concern.
- Provide advice and support to other colleagues in relation to safeguarding and child protection issues.
- Maintain a record of any child protection referral, complaint or concern (even where the concern does not lead to a referral).
- Ensure that parents/carers of learners within MTC Training are aware of the Safeguarding Policy.
- Liaise with the Local Authority and other appropriate agencies.
- Ensure that colleagues receive appropriate training in safeguarding and child protection issues and are aware of this policy.
- Ensure that all colleagues are trained to an acceptable standard, by establishing and maintaining a training plan/schedule and monitoring compliance with this, ensuring action is taken for non-compliance.
- Update the Safeguarding Lead Non-Executive Director on arising issues, concerns and referrals to external agencies

## 8.2 Deputy Designated Safeguarding Lead and Safeguarding Officers

To ensure that there is sufficient support for safeguarding issues throughout MTC Training, the Deputy Designated Safeguarding Lead (DDSL) and Safeguarding Officers (SOS's) who have received Designated Safeguarding Lead training will be available to support colleagues on safeguarding issues in the absence of the DSL.

The DDSL and SO's will be expected to:

- Refer cases of suspected abuse to the DSL or directly to local authority children's social care in the absence of the DSL.
- Refer cases of suspected radicalisation to the DSL or Channel Programme in the absence of the DSL.
- Provide advice and support to other colleagues in relation to safeguarding and child protection issues.

- Maintain a record of any child protection referral, complaint or concern (even where the concern does not lead to a referral).

### 8.3 Contact Details

- Designated Safeguarding Lead (DSL): David Lee
- Deputy Designated Safeguarding Lead (DDSL): James Wagstaff
- Safeguarding Officer (SO) AMTC: Kay Sellick
- Safeguarding Officer (SO) AMTC: Donna Mason
- Safeguarding Officer (SO) OAS: Helen Blake
- Safeguarding Officer (SO) OAS: Nikki Smith
- Safeguarding Officer (SO) OAS: Mark Dickson
- Safeguarding Officer (SO) OAS: Debbie Watson
- **Email:** [safeguarding@the-mtc.org](mailto:safeguarding@the-mtc.org)
- **24 Hour Safeguarding Hotline: 02476701635**

### 8.4 External Agencies

Oxford Safeguarding Children Board:

4.2.42. Email: [oscb@oxfordshire.gov.uk](mailto:oscb@oxfordshire.gov.uk)

Oxfordshire County Council Multi Agency Safeguarding Hub (MASH):

4.2.43. Email: [mash-children@oxfordshire.gov.uk](mailto:mash-children@oxfordshire.gov.uk)

4.2.44. Tel: 03450507666F

Coventry Safeguarding Children Partnership and Adult Safeguarding Board:

4.2.45. Email: [CoventryCSCP@coventry.gov.uk](mailto:CoventryCSCP@coventry.gov.uk)

4.2.46. Tel: 02476975477

Coventry City Council Multi Agency Safeguarding Hub (MASH):

4.2.47. Email: [mash@coventry.gov.uk](mailto:mash@coventry.gov.uk)

4.2.48. Tel: 02476788555

West Midlands Police Child Abuse Investigation Unit:

4.2.49. Tel: 02476539044

West Midlands Police safeguarding Adult Services:

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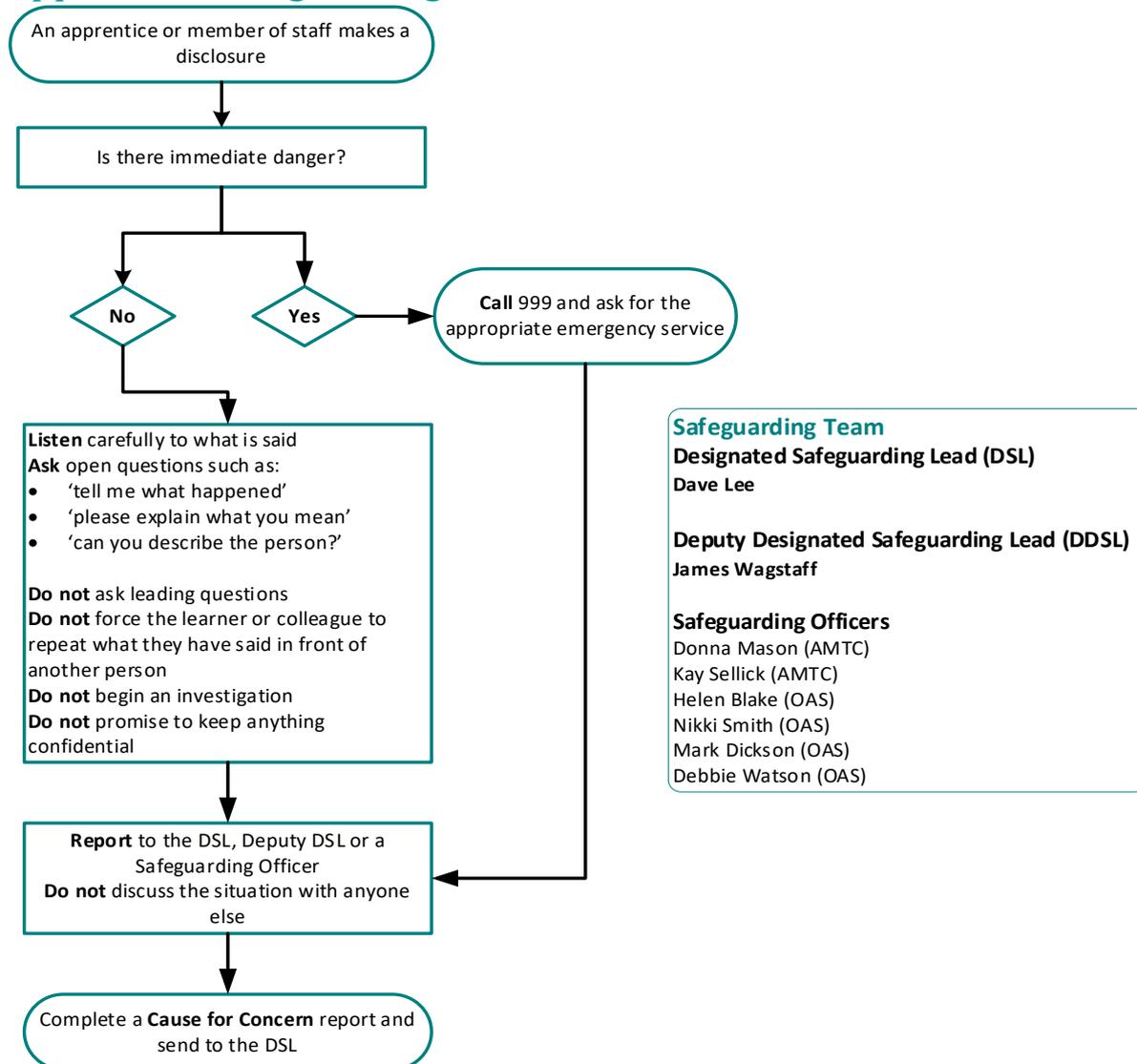
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4.2.50. Tel: 0121 101 EXT: 8811 3255/3226/3278

## Appendix 1 Safeguarding Disclosures Process



**Notes:**

- Always take the attitude of **it could happen here** where safeguarding is concerned
- Be vigilant, notice changes in behaviour and attitude – **see it and report it quickly**
- Don't assume another colleague will take action
- Report concerns you have using the **Cause for Concern** Report quickly
- Report what you saw and heard, not what you think
- Where possible, record any discussions verbatim
- Confidentiality
- Don't promise not to share a disclosure
- Only share with a member of the Safeguarding Team

## Appendix 2 Managing Allegations of Abuse Against Colleagues

### 2.1 Introduction

This procedure applies to all apprentices and students studying with MTC Training, current contracted colleagues, and members of the Board. For the purpose of this procedure, the term 'colleagues' refers to any person directly employed by MTC Limited or its subsidiaries. Any allegations against colleagues who are no longer employed by MTC Training will be referred to the Police and the Local Authority Designated Officer (LADO).

Due to the frequent contact with young people and vulnerable adults, colleagues in MTC Training may have allegations of abuse made against them and, in rare instances, such allegations may be true. MTC Training recognises that an allegation of abuse may be made for a variety of reasons and that the facts of the allegation may or may not be true. Therefore, it is imperative that those who are managing allegations maintain an open mind and those investigations are completed thoroughly and promptly.

### 2.2 Considerations

When an allegation is made there are two important aspects to consider:

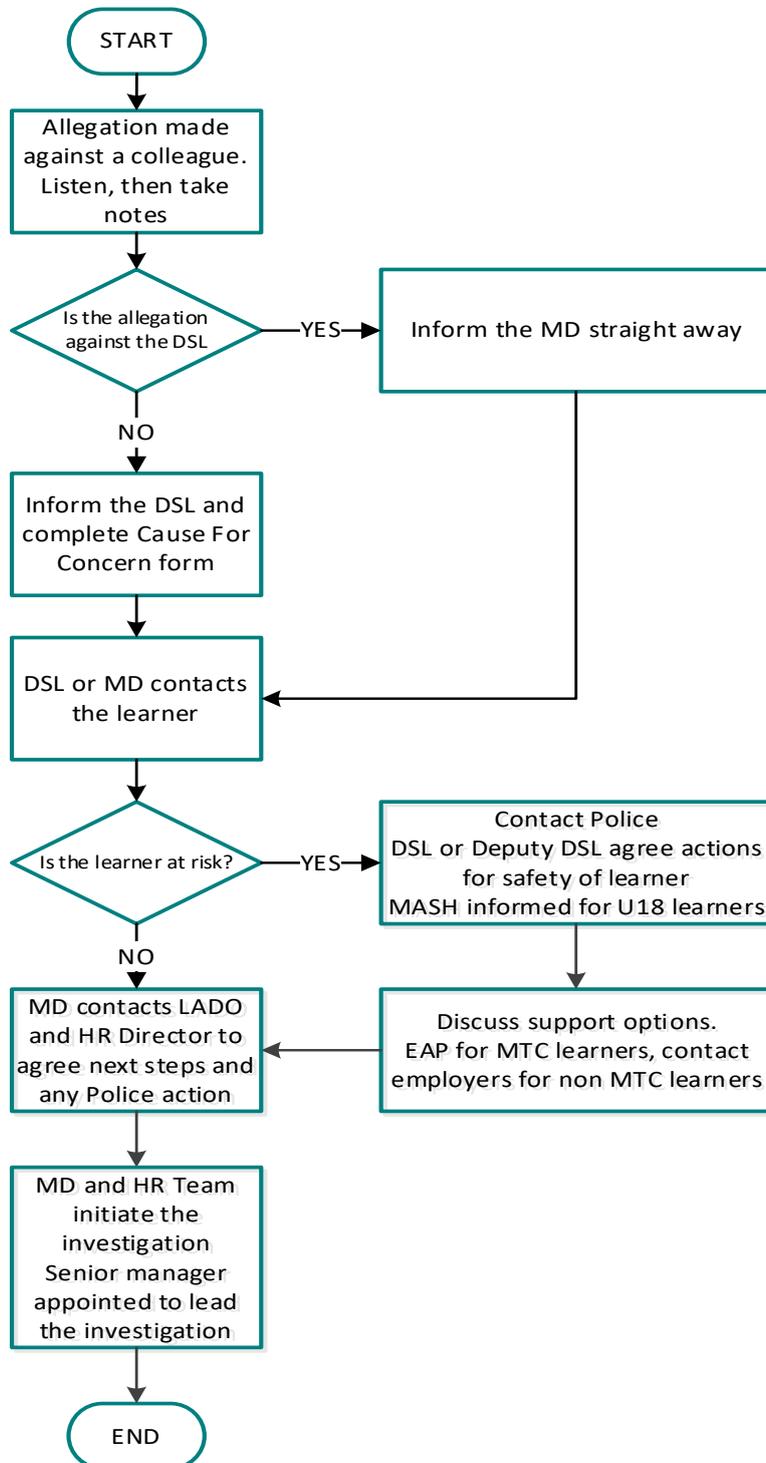
1. The safety and welfare of the apprentice or student

***The Designated Safeguarding Lead (DSL) is responsible for ensuring the apprentice or student is not at risk and that referrals have been made to the appropriate agencies***

- 
2. Investigating and supporting the person subject to the allegation.

***The MTC Training Managing Director (MD) will work with Human Resources and may delegate investigation responsibilities within the Senior Leadership Team to carry out swift investigation while ensuring support is provided***

2.3 Managing Allegations of Abuse Against Colleagues Process (flowchart)



## Appendix 3 Technical requirements to meet Department for Education digital and technology standards

### Areas to understand:

- The risk profile of our learners, including their age range, learners with special educational needs and disability (SEND), learners with English as an additional language (EAL)
- What our filtering system currently blocks or allows and why
- Any outside safeguarding influences, such as county lines
- Any relevant safeguarding reports
- The digital resilience of our learners
- Teaching requirements, for example, your RHSE and PSHE curriculum
- The specific use of chosen technologies, including Bring Your Own Device (BYOD)
- What related safeguarding or technology policies and procedures we have in place
- What checks are currently taking place and how resulting actions are handled

### The review must include:

- Related safeguarding or technology policies and procedures
- Roles and responsibilities
- Training of colleagues
- Curriculum and learning opportunities
- Procurement decisions
- How often and what is checked
- Monitoring strategies

### The review must record:

- When the checks took place
- Who did the check
- What they tested or checked
- Resulting actions

### We will also ensure that:

- All colleagues know how to report and record concerns
- Filtering and monitoring systems work on new devices and services before releasing them to staff and pupils
- Blocklists are reviewed and they can be modified in line with changes to safeguarding risks