MPCT™

Motivational Preparation College for Training

S001 - Safeguarding Policy

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e.g. 0.1 is the first draft of this document. Subsequent amendments are indicated by 0.2, 0.3 etc, until the document is live.

Live Versions

Document and policy version number starting with the number 1 or above indicate that they are live.

e.g. Version 1

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Contents

Safeguarding Policy

1. Introduction

1.1   Safeguarding is defined as 'keeping children and vulnerable adults safe from harm, such as illness, abuse, radicalisation, or injury'.

1.2   MPCT is committed to providing a safe and secure environment in which both Learners and Staff can flourish. This policy has been written to provide sufficient guidance to ensure that this commitment is embedded into the culture and ethos of the company. It is thus essential that all staff are aware of their duties with regards to safeguarding, and report any concerns promptly.

1.3   When discussing a Child or Young Person (CYP) or vulnerable young adult within this policy, the use of Learner will relate to all individuals undertaking a course of study. Irrespective of whether they are a child or adult, Learner will be used for ease of simplicity to help refer to all.

1.4   The main purpose of this policy is to help staff and visitors know what action they should take if they think a Learner may be at risk.

1.5   MPCT recognise that 'Safeguarding' is equally applicable to both children and adults, and, unless specifically indicated, makes no differentiation between them.

2. Determination

2.1   The Education (Independent School Standards) Regulations 2014 and the Non- Maintained Special Schools (England) Regulations 2015 requires MPCT to have arrangements in place to safeguard and promote the welfare of children.

2.2   All MPCT Staff must have regard for this guidance when fulfilling their responsibilities for safeguarding and promoting the welfare of all Learners.

2.3   As included in the Social Services and Wellbeing Act (Wales) 2014 and Working Together to Safeguard Children 2018 (England)m there is a duty to report all safeguarding concerns that reach threshold to the Local Authority.

2.4   Access to guidance regarding the application and management of safeguarding concerns are contained within Keeping Children Safe in Education 2021 (England) & Keeping Learners Safe 2021 (Wales).

2.5   The Directors and staff of MPCT fully recognise the contribution it makes towards safeguarding Learners. We recognise that all staff, including volunteers and visitors, have a full and active part to play in protecting our Learners from harm.

2.6   All staff and Directors believe that the college should provide a caring, positive, safe, and stimulating environment, which promotes the social, physical, and moral development of the individual Learner. This Policy incorporates five main

elements:

    a. Protection through teaching and pastoral support offered to Learners;

    b. Procedures for identifying and reporting cases, or suspected cases, of abuse;

    c. The day-to-day contact with Learners means college staff are uniquely placed to observe signs of abuse;

    d. Provide support to Learners who may be at risk of abuse or neglect;

    e. Ability to identify concerns in relation to MPCT staff who may abuse positions of trust;

2.7   The welfare of children and vulnerable adults is everyone's responsibility, particularly when it comes to protecting them from abuse, and this ethos is paramount within all activity associated with MPCT.

3. Scope

3.1   MPCT has a whole college approach to Safeguarding; consequently, this Policy applies to all staff and volunteers working within MPCT. It recognises that any member of staff, irrespective of role, can be the first point of disclosure for a Learner. Consequently, all staff should:

    a. Be aware of the signs that a Learner has been neglected or abused;

    b. Listen to Learners who tell them about abuse;

    c. Report concerns effectively and in line with procedure.

3.2   MPCT acknowledges that children are amongst the most vulnerable in society. Therefore, adults in positions of trust have a duty to ensure that the rights of children and young people to protection from abuse are taken seriously, and effective action is taken in response to any signs or abuse or neglect.

3.3   MPCT has a legal duty of care for the health, safety, security, and wellbeing of their Learners and staff at all times. This duty of care incorporates the duty to safeguard all Learners from subjection to any form of harm, abuse, or nuisance. It is the responsibility of the Directorate and Senior Management to ensure that this duty is discharged at all times.

3.4   This policy is an open document and is shared with all staff, Learners, Parents/carers, and any other interested parties. The policy is publicly available via the company website, and is referred to in both the joining documentation and our privacy statement.

4. Aims

4.1   This policy aims to:

4.2   Promote an understanding that a Learner who is abused or who witnesses violence may be deeply affected, and this may manifest itself in a number of ways;

4.3   Recognise that each college may provide the only stability in the lives of Learners who have been abused, or who are at risk of harm;

4.4   Establish and maintain an ethos where Learners feel secure, and are encouraged to talk, and are listened to;

4.5   Promote a Learner-centred and outcome-focused approach;

4.6   Provide a nurturing environment where self-esteem and self-assertiveness are promoted for all Learners, including those that are vulnerable;

4.7   Ensure that Learners know there are Responsible Adults in the college whom they can approach if they are worried or in difficulty;

4.8   To include in the curriculum activities and opportunities for personal development, which equip Learners with the skills they need to stay safe from abuse, and to know to whom to turn for help;

4.9   Support the Learner's development in ways that will foster security, confidence, and independence;

4.10   To include in the curriculum material which will help the Learner develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting;

4.11   Raise the awareness of both teaching and non-teaching staff of the need to safeguard Learners, and of their responsibilities in identifying and reporting possible cases of abuse;

4.12   Provide a systematic means of monitoring Learners known, or thought, to be at risk;

4.13   Emphasise the need for good levels of communication between all members of staff;

4.14   Develop a structured procedure within MPCT, that will be followed by all members in cases of suspected abuse;

4.15   Develop and promote effective working relationships with other agencies, especially the Police and Children's Services;

4.16   Ensure that all adults within the college, who have access to children, have been checked as to their suitability in line with statutory guidance.

5. Procedures

5.1   MPCT will follow the All-Wales Child Protection Procedures (Wales) and Working Together to Safeguard Children (England), working with all statutory partners to ensure the safeguarding of Learners under their control, as defined in the relevant national guidance detailed in para 2.4 of this document.

5.2   To further support the implementation of the relevant national guidance, all staff will, on an annual basis, read and review the relevant documentation as defined by that guidance, according to their role, and acknowledge such action through the appropriate MPCT network portal.

5.3   MPCT will ensure a senior member of staff is appropriately trained and charged with the responsibility for co-ordinating child protection matters.

5.4   Each region will have a Regional Designated Safeguarding Lead (RDSL), and that all staff, both teaching and non-teaching, are aware of who that person is.

5.5   The RDSL will be supported in each centre by Nominated Safeguarding Person (NSP); this person will normally be the Centre Manager/Lead Instructor.

5.6   Both English and Welsh guidance refers to a designated senior role who has responsibility for safeguarding. This function is fulfilled within MPCT by the Lead Safeguarding Officer (LSO).

5.7   To further support and develop the role of DSL/DSP, quarterly individual supervisory meetings will be held by the LSO with all DSL/DSP. These will be competency-based, and focus on providing support and guidance to develop the individual's skills and abilities within this role.

6. Roles and Responsibilities

6.1   Senior Leadership Team Responsibilities. The CEO/DCEO, along with all directors at MPCT, abide by their responsibilities as outlined in Keeping Children Safe in Education. SLT also have specific responsibility for ensuring that the College monitors the impact of its work, and learns lessons from Serious Case Reviews. As stated in Keeping Children Safe in Education (2020), "Governing bodies should ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare".

6.2   MPCT SLT ensures that the College:

   a. Provides a safe environment for children, young people, and adults at risk of harm to learn in;

b. Identify those who are suffering or are likely to suffer significant harm, or who are at risk of radicalisation;

c. MPCT have put in place and appointed a Director as a member of the Senior Leadership Team as Designated Senior Lead for Child Protection, to take lead responsibility for Child Protection issues. This Director is the Director Risk Management, who is the Strategic Safeguarding Officer (SSO).

6.3   The Nominated Director for Safeguarding will:

a. Ensure that MPCT has a robust Learner Safeguarding Policy in place, which is consistent with the relevant Child Protection Procedures, and is readily accessible to all members of staff, both teaching and non-teaching;

b. Ensure that the implementation and effectiveness of the policy, and any associated policies, are reviewed at a minimum annually, by ensuring its inclusion as a standard item on the SLT agenda. This will also ensure that account is taken of new guidance;

c. Ensure that the MPCT Induction booklet contains a section on the Child Safeguarding Policy in order to make parents aware of the school's responsibilities and duties;

d. Ensure, in conjunction with the Chief Executive Officer (CEO), Deputy Chief Executive Officer (DCEO), and LSO, that Safeguarding retains a position of prominence within the MPCT agenda/ curriculum;

e. Ensure that designated safeguarding leads and other staff attend appropriate training;

f. Ensure that they are trained for the role of Director to Level 3 with responsibility for child protection, and understand their role in relation to any referral of abuse, in relation to the CEO or DCEO.

g. Liaise with the Local Authority Safeguarding Coordinator for Education in relation to any allegations of child abuse made against any member of the Senior Leadership Team (SLT) or the Senior Management Team (SMT) which may include attendance at any Professional Abuse Strategy meetings.

h. Have an understanding that it is not the role of the Safeguarding Director to receive and act upon child abuse referrals, other than in specific circumstances outlined in para 6.3.g.

i. To investigate any allegations of abuse made against any member of the Senior Leadership Team.

j. The nominated Director undertakes appropriate training;

k. Take appropriate action to see that Learner(s) are kept safe at MPCT, and that disclosures of potential abuse occurring at home or elsewhere are reported appropriately;

l. Report allegations of modern slavery and / or human trafficking, in accordance with the Modern Day Slavery Act 2015;

m. Have a system for identifying concerns in relation to abuse of adults at risk of harm, and effective methods of responding to disclosures through the Safeguarding MIS MyConcern.

n. Oversee and ensure the Referral of concerns that a child, young person, or adult at risk of significant harm, or might be at risk of significant harm to the appropriate referral agencies;

o. Work effectively with others, as required by "Working Together to Safeguard Children";

p. Listen to the voice of a child, and always act in the interest of the child;

q. Ensure appropriate safeguarding responses for children who go missing from College;

r. Have safeguarding policies and procedures that are consistent with the local Safeguarding Children Partnership requirements, reviewed annually, and made available via the college website.

6.4   The SSO and all staff who support safeguarding within MPCT will receive adequate training to familiarise them with their safeguarding roles and responsibilities. They will be familiar with MPCT procedures and policies, and receive refresher training at least every 2 years. A senior member of staff will co-ordinate child protection arrangements and will be the Lead Safeguarding Officer (Designated Senior Lead) (DSL); this is the HoSOC (Head of Safeguarding and Operational Compliance). They will be assisted by Regional Designated Leads (RDSL), who will support and share responsibility for safeguarding across the MPCT regions.

6.5   The Lead Safeguarding Officer (LSO) will:

a. Provide professional support and guidance to the RDSLs;

b. Ensure that in the absence of the RDSL, all staff are aware of how to forward any Child Protection concerns;

c. Liaise and work with all other support services and agencies involved in the safeguarding of Learners;

d. Receive concerns and disclosures made to staff with regard to abuse, health and wellbeing, and complaints made against staff.

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e. Act as a source of advice and support within the college, and provide the point of contact for staff who have concerns or information that a Learner may be suffering from abuse;

f. Understand their individual responsibility to make any necessary reports to Children's Services, within proper channels and time-scales;

g. Ensure the college contributes fully to the child protection process, e.g. by the provision of reports and attendance at conferences, core groups, or meetings when needed;

h. Ensure that all staff, both teaching and non-teaching, are aware of their personal responsibility to report concerns, and of the need to be vigilant in identifying potential abuse and neglect;

i. Ensure that all staff, including those newly appointed, are aware of their child protection responsibilities, act in compliance with, and have access to the college's Learner Safeguarding Policy and the relevant Child Protection Procedures;

j. Ensure that all staff have signed to say that they have received, read, and understood the Learner Safeguarding Policy;

k. Ensure that all staff are trained and aware of the indicators of abuse, and how to respond and support a Learner who discloses it. This should be reviewed as a minimum annually;

l. Disseminate child protection information gained from training and other sources to all staff in the college;

m. Ensure an understanding that it is not the role of college staff to investigate reported abuse;

n. Feedback appropriate information to staff on a 'need to know' basis;

o. Ensure that the identity of the LSO and Director responsible for Safeguarding is known across the college community;

p. Consult with Children's Services where there is uncertainty about the need to make a referral;

q. Ensure parents are given access to the Learner Safeguarding Policy as part of their Learner's induction into the college, and that Learners are made aware of the existence of this policy;

r. Ensure a clear record of concerns about a Learner is maintained, even if there is no need to make an immediate report;

s. Keep all records, including copies of child protection referrals and child protection conference minutes, confidentially and securely, and are kept separate from Learner records by being uploaded onto MyConcern Learners' records;

t. Ensure that, when a learner whose name appears on the Child Protection Register transfers to another school or educational provider, the Learner's records, including information about registration, are transferred without delay. Records should be sent electronically to coincide with the day the Learner commences on roll at the new educational setting, and Children's Services should be informed;

u. Act as the first point of contact for any concerns about violence against women, domestic abuse, and sexual violence regarding children and young people. A child or a young person's development and education can be compromised as a result of domestic violence and abuse.

6.6   The Regional Dedicated Safeguarding Lead (RDSL). The role of the DSL carries a significant level of responsibility, and MPCT will provide the additional time, funding, training, resources, and support they need to carry the role effectively

6.7   The roles and responsibilities of the DSL/DSP are laid out in the relevant guidelines detailed in para 6.4 above; however, below are some of the main considerations and expectations of the role:

a. Refer cases of suspected abuse to the local authority children's social care, as directed by the LSO;

b. Support staff who make referrals to statutory agencies;

c. Refer cases to the Channel programme, where there is a radicalisation concern, as required;

d. Bring to the attention of the LSO any professional engaged with young persons who may pose a harm to them;

e. Refer cases of where a crime has been committed promptly to the Police as required

f. Liaise with the head teacher (MPS Learners), or Director of Risk Management, or Deputy Director (MPC/Sports Learners), to inform him or her of any issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police.

g. Liaise with senior mental health leads/mental health support team, where safeguarding concerns are linked to mental health.

h. Liaise with staff on matters of safety and safeguarding, and when deciding whether to make a referral, and act as a source of support, advice, and expertise

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for all staff.

6.8   The Nominated Safeguarding Person:

a. Will act as a deputy DSL/DSP in the absence of the RDSL, and perform the duties as outlined above.

b. Will support and advise college work colleagues.

c. Will be the point of contact following referral for Statutory Agencies within the college area.

d. Ensure that all records are maintained with regard to any safeguarding concerns, using MPCT MyConcern as required.

6.9   Record Keeping.

a. A hard copy of the relevant Child Protection Procedures for either England or Wales must be kept on the college site and be accessible to all staff.

b. All records pertaining to child protection must be securely kept.

c. Concerns will be shared with relevant professionals involved with the child, but records will not be available without the authority of the LSO.

d. All documents in relation to Child Protection will be retained for 35 years, and those for Children in Need of Care and Support for 10 years.

e. All records will be recorded using the 'My Concern' reporting system.

7. Safer Recruitment

7.1   The college will ensure that safe recruitment procedures are in place and that all appropriate checks, including the Disclosure and Barring Service checks, are undertaken in respect of all staff who work with Learners. Please refer to the MPCT Safer Recruitment Policy.

8. Curriculum

8.1   The Senior Leadership Team considers how Learners are taught themes of safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through PHSE, SRE, SEAL, SMSC, British Values, e-safety, Learner forums, approved visitors, etc.

8.2   MPCT makes use of the DfE "one stop" page for teachers on GOV.UK, outlined within. Teaching about relationships, sex, and health. This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

8.3   MPCT makes use of the DfE "one stop" page for teachers on GOV.UK, outlined within, teaching about relationships, sex, and health. This includes teacher training modules on the RSHE topics, and non-statutory implementation guidance.

8.4   We are familiar with the following resources to help us plan and teach about safeguarding:

  a. Teaching online safety in schools.

  b. UK Council for Internet Safety (UKCIS) guidance Education for a connected world.

  c. UKCIS guidance Sharing nudes and semi-nudes: advice for education settings working with children and young people.

  d. The UKCIS external visitors guidance   to ensure the maximum impact of any online safety sessions delivered by external visitors.

  e. National Crime Agency's CEOP education programme *ThinkuKnow*.

8.5   Using the resources above, our Learners are taught to recognise when they are at risk, and how to get help when they need it.

8.6   We will provide opportunities for Learners to develop skills, concepts, attitudes, and knowledge that promote their safety and well-being. Relevant issues will be addressed through the curriculum, for example self-esteem, emotional literacy, assertiveness, power, exploitation, sex and relationship education, consent, e-safety, British Values, bullying, and sexting. Issues will be addressed through other areas of the curriculum, for example, PSHE and SMSE sessions.

9. Training

9.1   All staff and volunteers will receive Safeguarding Children and Young People training.

9.2   All staff and volunteers will receive Induction Training; this is mandatory and will include:

  a. Our child protection policy (inclusive of procedures to deal with peer-on-peer abuse)

  b. Our behaviour policy for Learners

  c. Our staff behaviour policy

  d. Our safeguarding response to children who go missing from education

e. Our online safety policy

f. The role of our designated safeguarding lead and deputy designated safeguarding lead.

g. Annex A - Keeping Children Safe in Education 2021. Staff who do not work directly with children will be suitably informed by reading (and signing for understanding) Annex A of the guidance. Annex A is a condensed version of part 1.

h. All staff who work directly with children in the college will read and sign acceptance of understanding for Parts 1, 4, & 5 including Annex B) Explanation of the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).

i. DSL's/Directors/HoD will read the whole document

9.3   Our Designated Safeguarding Leads (and deputies) will attend training every two years; and in addition to formal training, their knowledge and skills will be refreshed at regular intervals, at least annually.

9.4   All of our other staff will receive regular safeguarding and child protection updates, as required, to provide them with relevant skills and knowledge to safeguard children effectively.

9.5   Safer Recruitment training is available to all relevant staff and governors who are involved in the recruitment process (see part twelve of this document).

10. Safeguarding and Promoting the Welfare of Children

10.1   Safeguarding and promoting the welfare of children is defined as:

a. Safeguarding and promoting the welfare of children and young people is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

10.2   Safeguarding and promoting the welfare of children is:

a. Protecting children from maltreatment;

b. Preventing impairment of children's mental and physical health or development;

c. Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;

d. Taking action to enable all children to have the best outcomes.

10.3   Children includes everyone under the age of 18.

10.4   Our staff are particularly important, as they are in a position to identify concerns early, provide help for children, and prevent concerns from escalating.

10.5   All our staff have a responsibility to provide a safe environment in which children can learn.

10.6   We have a designated safeguarding leads (and trained deputies) who provide support to their staff and volunteers to carry out their safeguarding duties, and who will liaise closely with other services, such as Children's Services.

10.7   We are trained and prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years, through to the teenage years.

10.8   Any staff member who has a concern about a child's welfare follows the referral processes. Our staff understand they may be required to support social workers and other agencies following any referral.

10.9   The Teachers' Standards 2012 state that all teachers/instructors should safeguard children's wellbeing, and maintain public trust in the teaching profession as part of their professional duties. These include:

   a. Keeping Children Safe in Education (DfE, September 2021)

   b. Keeping Learners Safe (Welsh Government, 2021)

11. Referral to Statutory Agencies

11.1   All referrals to Statutory Agencies, including verbal referrals, should be followed up with a completed referral form within 24hrs of the original contact.

11.2   Please also refer to flow charts at Appendix 1.

11.3   The RDSL must be informed immediately by an employee, volunteer, or other persons, which includes the parents, child, or members of the public, in the following circumstances if:

   a. Suspicion that a Learner is being harmed.

   b. There is evidence that a Learner is being harmed.

11.4   The RDSL will ensure record of concerns raised are recorded, and supervise and support any referrals to Children's Services Social Care/Police if necessary.

11.5   Any member of staff or anyone who has knowledge of, or a suspicion that

a Learner is or has been suffering significant harm, or is at risk of significant harm, should discuss their concern with their RDSL or the LSO. There should be no delay in communication once suspicion arises. The sharing of relevant information at the earliest opportunity, within an environment of strict confidentiality, is essential. All information from parents, members of the public, and any of an anonymous nature must be acted upon.

11.6   Whenever possible, the issue should be discussed with parents/carers, except where to do so would jeopardise future enquiry or would not be conducive to the Learner's welfare.

11.7   If it is agreed that the issue puts the Learner at risk of significant harm, it must be reported directly to the LSO, or, in the case of an emergency, to the Police. This referral would normally be made by your RDSL.

11.8   The Learner should be kept informed of actions taken at all stages of the procedure, and maximum support offered/provided to them. Where the Learner is competent to give consent, their agreement to the referral should be sought.

11.9   If consent is refused, the referral should still be made, if it is considered necessary to protect the Learner from significant harm.

11.10   A written report of all discussions and action must be recorded via the 'My Concern' reporting mechanism, and all referrals and subsequent documents/files will be retained securely by the RDSL on this system.

   a. Report, record, and inform if the following occur:

   •   If you accidentally hurt a Learner.

   •   If a Learner seems distressed in any manner.

   •   If a Learner misunderstands or misinterprets something you have said or done.

   •   If a Learner needs to be restrained.

12. Partnership with Parents

12.1   The college supports parents to educate and keep children safe from harm, to support their welfare, and is committed to working with parents positively, openly, and honestly.

12.2   The college will ensure that all parents are treated with respect, dignity, and courtesy.

12.3   Parents' rights to privacy and confidentiality are respected, and sensitive information will not be shared without permission, unless it is necessary to do so in

order to protect a child.

12.4   To promote this ethos:

a. Parents are encouraged to discuss any concerns they may have with class instructors or the Centre Manager.

b. Parents are made aware of the Learner Safeguarding Policy in the college Handbook, and at the start of their child's education within the college. It is vital that parents understand the role of the college in relation to its safeguarding responsibilities, from the outset of the Learner's time at the college;

c. Parents are made aware that they can view this policy on request. This policy will be made available on the MPCT website and MPCT Parental application.

13. Responsibilities of all MPCT Staff

13.1   All staff are trained and aware that:

a. A child may disclose something that has upset or harmed them.

b. Someone else might report something that a child has told them, or that they believe that a child has been or is being harmed.

c. A child might show signs of physical injury for which there appears to be no explanation.

d. A child's behaviour may suggest he or she is being abused.

e. The behaviour or attitude of one of the workers towards a child may cause concern.

f. A child demonstrates worrying behaviour towards other children.

g. A child may display indicators of poor mental health.

13.2   We know that being professionally curious is not simply about asking the question. It is about the language used, creating a trusting relationship, a safe space in which to disclose, and giving time to Learners so they do not feel pressured.

13.3   All staff and volunteers are alert to the potential need for early help/referral to the Designated Safeguarding Lead for a child who:

a. Is disabled and has specific additional needs;

b. Has special educational needs (whether or not they have a statutory education, health, and care plan);

c. Is a young carer;

d. Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;

e. Is frequently missing/goes missing from care or from home;

f. Is misusing drugs or alcohol themselves;

g. Is at risk of modern slavery, trafficking, or exploitation;

h. Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems, or domestic abuse;

i. Has returned home to their family from care;

j. Is showing early signs of abuse and/or neglect;

k. Is at risk of being radicalised or exploited;

l. Is a privately fostered child.

13.4   We are aware that to consult with our designated safeguarding lead does not mean a referral has been made. This decision is mainly the responsibility of the designated safeguarding lead for child protection, who will contact the appropriate agency as and when required. However, all staff are aware that they can and should make referrals/consult with their local Multi Agency Safeguarding Hub (MASH).

13.5   Our staff know that, if they are unhappy with the response received from their designated safeguarding, all staff/volunteers have the right to contact the Lead Safeguarding Officer.

13.6   Staff will always discuss concerns with parents/carers, unless to do so would:

a. Place the child at risk of significant harm or further risk of significant harm.

b. Place a vulnerable adult at risk of harm.

c. Compromise any enquiries that need to be undertaken by Children's Services or the police.

13.7   MPCT will endeavour to ensure that parents understand the responsibilities placed on MPCT and staff for safeguarding children.

13.8   **UNDER NO CIRCUMSTANCES WILL MPCT STAFF LEAVE COLLEGE WITHOUT DISCUSSING SAFEGUARDING CONCERNS WITH RDSL/LSO.**

13.9   Only a minority of children actively disclose abuse. Most child abuse is

disclosed accidentally, or through observation by an adult of a child's behaviour, words, and physical appearance.

13.10   When a child does disclose abuse, this needs to be taken very seriously. It is important that any disclosure is dealt with appropriately, both for the wellbeing of the child, and also to ensure that our actions do not jeopardise legal action against the abuser.

13.11   PROCEDURES FOR WHEN SOMEONE IS CONCERNED ABOUT A CHILD OR YOUNG PERSON INCLUDING EARLY HELP

13.12   All concerns for children and young people will be recorded on our safeguarding management information system (My Concern).

13.13   All concerns will be recorded as soon as possible.

13.14   All concerns will be referred to the designated safeguarding lead/deputy designated safeguarding lead, or LSO in their absence.

13.15   All concerns of significant harm will be referred to the Local Authority Children's Services (MASH) without delay

13.16 All concerns of allegations in relation to staff and volunteers' harmful behaviour will be referred to the LSO.

13.17   Remember, records should include:

   a. A clear and comprehensive summary of your concern;

   b. Details of how the concern was followed up and resolved;

   c. A note of any action taken, decisions reached, and the outcome.

13.18 If you are in doubt about recording requirements, you should discuss this with the designated safeguarding lead (or deputy).

13.19 Any concerns - whether about a child, young person, family, colleague, or another professional - must be shared with the LSO.

13.20 All staff have a duty to assist in the assessment of possible child abuse, by sharing information and reporting concerns as outlined in this policy. Staff may have the one key piece of information that will help Children's Services make the best decision about a child.

13.21 **Doing nothing is not an option.**

13.22 In the event of a disclosure being made, an immediate verbal referral to relevant Children Service. This will then be followed by a written referral within 24

hours.

13.23 Never promise a Learner you will keep a secret; explain that if they tell you something you think may put them at risk of harm, you will have to tell someone who can help keep them safe.

13.24 It may be difficult or upsetting to report a concern, and it is sometimes hard to accept that a child is being harmed, particularly if there is an existing relationship with the family or professional concerned. However, the needs of the child must always come first. It is the role of the RDSL to support and listen to concerns.

13.25 If a child tells you something that causes you concern:

a. Listen to the child;

b. Never promise a child you will keep a secret; explain that if they tell you something you think may put them at risk of harm, you will have to tell someone who can help keep them safe;

c. Encourage the child to talk, but don't prompt, or put words into their mouths, and do not ask leading questions;

d. Do not ask the child to repeat again and again;

e. Explain what action you must take, in a way that is age appropriate;

f. As soon as you are able, write down what the child has told you. Use the child's exact words if possible. Record the date, time and place and any other people present at the time;

g. Report concerns without delay to the RDSL;

h. Do not worry you may be mistaken; it is better to discuss your concerns with someone who has the experience and the responsibility to make an assessment;

j. Do not confront an alleged abuser;

k. Try to remain calm and not to appear shocked by what they are telling you;

l. A child, parent, caregiver, or member of the public who tells staff their concerns about a child's welfare must never be expected to be asked to make a self-referral to social services or police;

m. If you have concerns about the behaviour of another colleague, do not dismiss these concerns. Action should be taken in accordance with the appropriate MPCT policies. It is very important not to ignore or dismiss suspicions about another professional or colleague, but approach the LSO with your concerns;

n. If a child discloses a matter of concern to you, it can be very upsetting, but try not to take these feelings home with you. Talk to the LSO; it is important not to ignore these feelings.

o. When reassuring victims of abuse, they should never be given the impression that they are creating a problem, or be made to feel ashamed.

14. Confidentiality

14.1   Staff cannot keep a disclosure of abuse confidential, and must refer the matter on to the LSO via their RDSL.

14.2   Educational staff have a legal responsibility to share relevant information about the protection of children with the designated statutory agencies.

14.3   All referrals should be made with the knowledge that, during any subsequent investigation, the source (i.e. the College) will be made known to the family.

14.4   Any disclosure should be dealt with sensitively, and the child must be helped to understand that there is a need to inform the appropriate people who can help. Staff should be aware that any disclosure may have taken significant courage to voice, and that there may be a variety of accompanying emotion such as guilt, embarrassment, disloyalty, and hurt.

14.5   Other staff may need to be alerted to concerns about a child or young person, possibly in order to monitor the concern, or to gather further evidence prior to a referral being made, or to assist in providing appropriate support to a child or young person once a referral has been made. Information should only be shared on a strict need to know basis.

14.6   Ensure that only those with a professional involvement (e.g. the RDSL, LSO) have access to the child protection records. At all other times, they should be kept securely and separate from the Learner's main file.

15. Information Sharing

15.1   Numerous acts of legislation, including the Children Act 1989 and the Crime and Disorder Act 1998, provide the powers to share information with statutory agencies to promote children's welfare and safeguarding.

15.2   The UK GDPR guidelines provides the framework for such sharing of information, including its retention and disposal.

15.3   Timely transfer of child protection files, to allow the new school or college to continue supporting children who have had a social worker and been victims of abuse, and have that support in place when the child arrives.

15.4   See App H for the 7 golden rules of information sharing.

16. Allegations of misconduct against a Learner

16.1   The MPCT Learner Disciplinary Procedures may be invoked, as well as reporting the case to Social Services and/or the Police. The outcome of a Learner Disciplinary Hearing may be exclusion from MPCT. That decision may not necessarily be bound by the outcome of a Police investigation.

17. Allegations against staff and volunteers

17.1   The college acknowledges that a Learner may make an allegation against a member of staff;

17.2   Any allegation against any Senior Management Team should be directly referred to the designated Director. It is the responsibility of this Director to make the appropriate referral;

17.3   When an allegation is made against a member of staff, the member of staff to whom the allegation has been made known will immediately inform the RDSL, or, in absence of the RDSL, the LSO;

17.4   The actions that will be taken to safeguard children in the college will be in line with guidance contained in the relevant Child Protection Procedures;

17.5   Any allegations against staff should be taken directly and as a matter of urgency to the LSO, who will seek advice from the Director of HR.

17.6   The LSO should discuss the content of the allegation with the Local Authority Safeguarding Coordinator for Schools (Wales), Local Authority Designated Officer (England). This discussion will consider the nature, content, and context of the allegation, and agree a course of action;

17.7   The initial enquires should establish:

   a. That an allegation has been made.

   b. What is alleged to have occurred.

   c. When and where the incident/s are alleged to have occurred.

   d. Any other parties who may have been involved.

   e. Any other persons present.

17.8   It is important to establish as much of the above information as practical, in order to assist with on-going enquires;

17.9   False or malicious allegations will be dealt with in line with MPCT Discipline Policy.

18. Whistleblowing

18.1   There is a recognition that Learners cannot be expected to raise concerns in an environment where staff fail to do so.

18.2   If concerns exist in relation to attitude or actions of colleagues, staff should be aware of their duty to raise these issues. Staff should raise concerns in line with the whistleblowing policy, should they feel unable to raise issues openly through their manager.

19. Equality and Diversity

19.1   MPCT is committed to ensuring that all Learners gain maximum benefit from their education regardless of ethnic origin, sex, age, sexual orientation, disability, religious belief, or non-belief, use of Welsh language, BSL or other languages, nationality, responsibility for any dependent, or any other reason which cannot be shown to be justified. For more detail, refer to MPCT Equal Opportunities Policy.

20. Transition

20.1   Transition is the period when young people develop from children to young adults. This is not a single event, such as leaving school, but a growing-up process that unfolds over several years, and involves significant emotional, physical, intellectual, and physiological changes. During this period, young people progressively assume greater autonomy in many different areas of their lives, and are required to adjust to different experiences, expectations, processes, places, and routines. Transitions also impact on the family or those who care for the young person/young adult.

20.2   Adolescence and the move to becoming a young adult are increasingly being recognised as a distinct developmental phase, much as children under five or older people are well-established with care needs adapted appropriately. Yet young people often do not have the same recognition of any specific requirements when it comes to the provision of services. There is a general lack of provision for, and knowledge of, the specific needs of the young adulthood developmental phase.

20.3   MPCT recognise that 'transition' is a significant phase within a young person's development, and are committed to recognising and supporting them through this difficult period.

21. The Use of Reasonable Force

21.1   There are circumstances when it is appropriate for staff to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff, that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances, such as breaking up a fight, or where a young person needs to be restrained to prevent violence or injury to themselves or others. 'Reasonable' in these circumstances means 'using no more force than is necessary'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact, such as leading a pupil by the arm out of the classroom.

21.2   MPCT believes that the adoption of a 'no contact' policy at college can leave staff unable to fully support and protect their pupils and students.

21.3   The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned, and should always depend on individual circumstances.

21.4   When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, the college should, in considering the risks, carefully recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010, in relation to making reasonable adjustments and being non-discriminatory.

21.5   MPCT will encourage the planning of positive and proactive behaviour support, for instance, through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers. By doing so, each college can reduce the occurrence of challenging behaviour and the need to use reasonable force.

21.6   MPCT policy on physical intervention takes account of the relevant Local Authority Policy on The Use of Physical Intervention, and is adopted and reviewed annually by MPCT Safeguarding Board.

21.7   MPCT will ensure that every physical restraint is recorded appropriately, and sent to the relevant Local Authority as required. This will ensure an audit overview can be maintained centrally. Records of physical interventions are kept on pupil files and on MPCT's 'My Concern' system, and can be made available to parents on request.

22. Safeguarding Learners On and Off the College Site

22.1   Each Centre is considered a safe and secure place in which to learn and develop.

22.2   Access to each centre and building should be strictly monitored and reviewed, in line with the MPCT policy and guidance in relation to the Health and Safety of MPCT premises.

22.3   Visitors to any of the college's premises will be subject to robust and relevant Risk Management processes. This will include anybody, who are not subject to DBS checks, unless working with pupils under supervised conditions.

23   Visits Outside of College Premises (including Foreign visits)

23.1   It is recognised that there will be occasions when there will be opportunity to expand educational and social development, by Learner participation in college activities that take place away from the usual educational setting.

23.2   There may or may not be a residential component to the activity.

23.3   Schools should carry out all necessary Disclosure and Barring checks on adults providing care and accommodation. These visits differ to usual school tripsm as Learners spend less time under the direct supervision of instructors.

23.4   Whenever a trip is organised, it is important that there is close communication over the arrangements, to enable clarity as to the organisation of the Learners' time.

23.5   Appropriate Risk Assessment should be carried out in conjunction with the proposed activity/event.

24. Implementation of Policy

24.1   Overall responsibility for policy implementation rests with the Director of Risk Management. Designated Safeguarding Leads will be responsible for cascading the policy into operational action. All staff have a responsibility for the implementation of this Policy.

24.2   This policy is supported by national guidelines and procedures. These can be role-specific, and require staff to read and understand the relevant documents; this will include the current Keeping Children Safe in Education (KCSIE), which is updated annually.

a. Staff who do not work with children now have the option of reading and understanding Annex A, instead of Part 1 of KCSIE.

b. Those who work with Learners must read and understand Parts 1, 4, & 5, and Annex B of KCSIE.

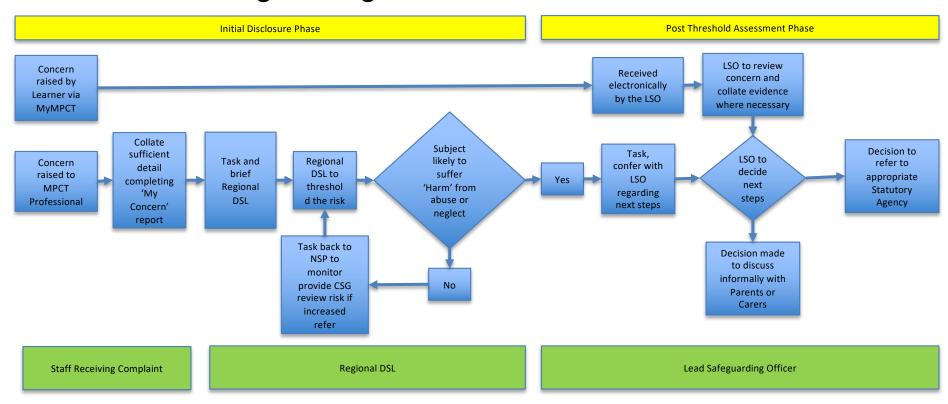c. Directors, Safeguarding Teams (DSLs), and SMT must read the whole document of KCSIE.

24.3   This policy is contained within the following documents and libraries.

    a. Induction handbook.

    b. Inspire.

    c. HR system.

    d. MPCT external website.

    e. MPCT Parental app.

24.4   MPCT will give regard to safeguarding principles when developing other policies.

24.5   Information in respect of further guidance and polices referred to within this document can be found at the start of this Policy. Further information in relation to Guidance and Circulars can also be accessed as a Useful Document.

24.6   All our policies which address issues of power and potential harm, for example bullying, equal opportunities, handling, positive behaviour, will be linked to ensure a whole MPCT approach.

24.7   Our Learner Safeguarding and Protection Policy cannot be separated from the general ethos of MPCT, which should ensure that Learners are treated with respect and dignity, feel safe, and are listened to.

25. Appendices

25.1   Appendix A: Safeguarding Concern Referral Process.

25.2   Appendix B: Definition of Child or Young Person Abuse.

25.3   Appendix C: Categories of Abuse

25.4   Appendix D: Staying Safe Online

25.5   Appendix E: Staff Support

25.6   Appendix F: Photographing, Videoing and Filming of Learners

25.7   Appendix G: Private Fostering

25.8   Appendix H: Information Sharing

Authorised by Director of Risk Management   Date reviewed - Sep 21
Reviewed by Head of Quality and Policy   S001 - Version 5
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Safeguarding Concern Referral Process

Initial Disclosure Phase	Post Threshold Assessment Phase

Concern raised by Learner via MyMPCT → Received electronically by the LSO → LSO to review concern and collate evidence where necessary

Concern raised to MPCT Professional → Collate sufficient detail completing 'My Concern' report → Task and brief Regional DSL → Regional DSL to threshold the risk → Subject likely to suffer 'Harm' from abuse or neglect

Subject likely to suffer 'Harm' from abuse or neglect → Yes → Task, confer with LSO regarding next steps → LSO to decide next steps → Decision to refer to appropriate Statutory Agency

Subject likely to suffer 'Harm' from abuse or neglect → No → Task back to NSP to monitor provide CSG review risk if increased refer

LSO to decide next steps → Decision made to discuss informally with Parents or Carers

Staff Receiving Complaint	Regional DSL	Lead Safeguarding Officer

Definition of Child and Young Person Abuse

1. Definition

1. 1   Abuse refers to actual or likely significant harm to a Learner or young person under the age of 18yrs.

2. Significant Harm

2.1   Some Learners are in need because they are suffering, or are likely to suffer, significant harm. The Children's Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. The Local Authority is under a duty to make enquiries, or cause enquiries to be made, where it has reasonable cause to suspect that a CYP is suffering, or likely to suffer, significant harm (Section 47 of the Children's Act 1989).

2.2   An amendment was made in January 2005 to the definition of Harm (Section 120 of the Adoption and Children's Act (2002)). Harm will also include 'the impairment suffered from seeing or hearing the ill-treatment of another'. This will amend section 31 sub-section 9 of the Children's Act 1989.

3. Learners in Need

3.1   Learners who are defined as being 'in need', under the Children's Act 1989, are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of services (Section 17(10) of the Children's act 1989). The critical factors to be considered in deciding whether a student is in need under the Children's Act 1989 are what will happen to a student's health or development without services, and the likely effect the services will have on the student's standard of health and development.

The categories of abuse

1. Categories of Abuse

1.1   The categories of abuses are usually described in four categories:

   a. Physical

   b. Sexual

   c. Emotional

   d. Neglect

1.2   These can often be described in much wider terminology when you consider the grooming, coercive, and domestic elements.

2. Physical Abuse

2.1   Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a Learner, including by fabricating the symptoms of, or deliberately causing, ill health to a Learner.

3. Female Genital Mutilation (FGM)

3.1   FGM is physical abuse, it has long lasting significant implications for those who have the procedure performed on them, and it is illegal. On 12 February 2015, the Government introduced a mandatory reporting duty for FGM. The intention is that the new duty will make professionals' responsibilities in respect of FGM clear, and that it will aid police investigations and support an increase in the number of perpetrators caught and prosecuted.

3.2   The duty applies to professionals working within healthcare or social care, and teachers/educators. It therefore makes it a duty for all MPCT staff to report as abuse. More detail can be found under the MPCT FGM guidance.

4. Forced marriage

4.1   Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical, emotional, and/or psychological. A lack of full and free consent can be where a person does not consent, or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

4.2   The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, with pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk.

5. Honour-Based Violence

5.1   Honour-Based Violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure, and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation), and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

5.2   If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

6. Sexual abuse

6.1   Sexual abuse involves forcing or enticing a Learner or young person to take part in sexual activities, whether the Learner is aware of what is happening or not, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic material, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child

in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

6.2   Peer on Peer Sexual violence and sexual harassment can occur between two children of any age and sex, from primary, through to secondary stage, and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally), and are never acceptable. As set out in Part one of KCSIE, all staff working with children are advised to maintain an attitude of 'it could happen here'. Further guidance can be found within DofE report Sexual violence and sexual harassment between children in schools and colleges.

6.3   Sexual Exploitation. 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.

6.4   Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

a. It can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex;

b. It can still be abuse even if the sexual activity appears consensual;

c. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;

d. It can take place in person or via technology, or a combination of both;

e. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;

f. It may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media);

g. It can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and

h. It is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due

to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

6.5   Some of the following signs may be indicators of child sexual exploitation:

a. Children who appear with unexplained gifts or new possessions;

b. Children who associate with other young people involved in exploitation;

c. Children who have older boyfriends or girlfriends;

d. Children who suffer from sexually transmitted infections or become pregnant;

e. Children who suffer from changes in emotional well-being;

f. Children who misuse drugs and alcohol;

g. Children who go missing for periods of time or regularly come home late; and

h. A children who regularly miss school or education or do not take part in education.

7. Emotional Abuse

7.2   Emotional abuse is the persistent emotional ill treatment of a Learner such as to cause severe and persistent adverse effects on the Learner's emotional development. It may involve conveying to Learners that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person, age or developmentally inappropriate expectations being imposed on Learners, causing them frequently to feel frightened, or the exploitation or corruption of Learners. Negative Discrimination (including racism) would also fall under emotional abuse.

8. Neglect

8.1   Neglect is the persistent failure to meet a Learner's basic physical and/or psychological needs, likely to result in the serious impairment of the Learner's health or development. Neglect may involve a parent or carer failing to:

a. Provide adequate food, clothing, and shelter (including exclusion from home or abandonment).

b. Or neglect of, or unresponsiveness to, a Learner's basic physical and emotional needs.

c. Ensure adequate supervision (including the use of inadequate care- givers).

d. Ensure access to appropriate medical care or treatment.

e. It may also include neglect of, or unresponsiveness to, a Learner's basic emotional needs

9. Bullying

9.1   Bullying (includes bullying by gangs; bullying by family members; physical bullying; verbal bullying; teasing; and harassment).

9.2   Signs and indicators of possible abuse. The recognition that a Learner may be being abused can be very difficult. For staff involved, this may be even more so. This is because indicators of possible abuse will come to your attention through emotional/behavioural signs from the Learner. Remember, it is not your responsibility to decide if a Learner has been abused; it is your responsibility to raise cause for concern and to refer on.

9.3   Recognising signs of abuse or how abuse may come to the attention of staff. The harm or possible harm of a learner is most likely to come to the attention of the staff member by:

a. The Learner divulging to someone about the allegation.

b. The Learner's behaviour.

c. An injury which aroused cause for concern.

d. Causes for concern being raised (when several factors occurred over time).

9.4   It is essential that any suspicions of risk of significant harm are acted on.

9.5   Any information about the possible abuse of a Learner received by staff, regardless of the source or any indication that action has already been undertaken, by whoever, must be acted upon without delay.

10. Domestic abuse

10.1   The cross-government definition of domestic violence and abuse is:

a. Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. The abuse can encompass, but is not limited to:

• Psychological;

• Physical;

- Sexual;

- Financial; and

- Emotional

10.2   Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse, or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

10.3   Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

NSPCC- UK domestic-abuse signs symptoms effects
Refuge what is domestic violence/effects of domestic violence on children
Safe lives: young people and domestic abuse

11. Radicalisation

11.1   Guidance from the Prevent Counter Terrorism Strategy sets out the responsibilities for 'specified authorities', which includes all educational establishments, to have 'due regard to the need to prevent people from being drawn into terrorism'. Due regard is defined as giving appropriate weight to the duty, taking into account the context of the college and its community. In fulfilling the duty, the college is required to demonstrate clear protocols for ensuring that any visiting speakers – whether invited by staff or by children themselves – are suitable and appropriately supervised.

11.2   MPCT will fulfil its Prevent duty as per its Prevent Policy, and will have due regard to the need to prevent people from being drawn into terrorism. Any immediate concerns will be reported to the LSO, who will make the appropriate referral to the Police Extremism and Counter Terrorism Unit. A referral should also be made to the relevant Children Services, identifying on the form that this is a Prevent concern, where any immediate child protection concerns can be assessed, and a decision will be made as to whether to refer to the Channel Panel.

11.3   The E-safety policy will ensure that children are unable to access unsuitable material on college premises.

11.4   MPCT will counter extremism and promote community cohesion by teaching a broad and balanced curriculum, which promotes the spiritual, cultural, physical, and mental development of pupils, and prepares them for the opportunities, responsibilities, and experiences of life.

11.5   Any visiting speakers will be assessed for suitability and will be appropriately supervised.

11.6   MPCT will ensure that all safeguards are appropriate and proportionate. There is a need for balance, as it is important to allow Learners the freedom to be different, experimental, and have strong views and to challenge ideas with healthy debate. It is also important to keep Learners safe from all forms of abuse and neglect, including exploitation, bullying, grooming, radicalisation, violent extremism, harassment, hate crime, and violence.

11.7   Each Centre should be safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The Prevent duty is not intended to limit discussion of these issues. Each Centre should, however, be mindful of their existing duties to forbid political indoctrination, and secure a balanced presentation of political issues. (Refer to MPCT Prevent and Radicalisation Policy)

12. County Lines

12.1   County lines is the police term for urban gangs supplying drugs to suburban areas, and market and coastal towns, using dedicated mobile phone lines or "deal lines". It involves child criminal exploitation (CCE), as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion, in a practice referred to as 'cuckooing'.

12.2   County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations.

12.3   County lines activity and the associated violence, drug dealing, and exploitation has a devastating impact on young people, vulnerable adults and local communities.

12.4   Some indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

    a. Persistently going missing from school or home and / or being found out-of-area;

    b. Unexplained acquisition of money, clothes, or mobile phones;

    c. Excessive receipt of texts / phone calls;

    d. Relationships with controlling / older individuals or groups;

e. Leaving home / care without explanation;

f. Suspicion of physical assault / unexplained injuries;

g. Parental concerns;

h. Carrying weapons;

i. Significant decline in school results / performance;

j. Gang association or isolation from peers or social networks;

k. Self-harm or significant changes in emotional well-being.

12.5   The college is committed to identify, support, and, where necessary, refer instances where Learners are suspected in involvement in 'County Lines' activities. All referrals will be made via the LSO.

13. Modern Slavery and Human Trafficking

13.1   Modern Slavery is the term used within the UK, and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour, and Human Trafficking (the of which comes from the Palermo Protocol).

13.2   These crimes include holding a person in a position of slavery, servitude, forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

13.3   Although human trafficking often involves an international, cross-border element, it is also possible to be a victim of modern slavery within your own country.

13.4   It is possible to be a victim even if consent has been given to be moved.

13.5   Children cannot give consent to being exploited; therefore, the element of coercion or deception does not need to be present to prove an offence.

14. Types of Human trafficking

There are several broad categories of exploitation linked to human trafficking, including:

14.1   Sexual exploitation

14.2   Forced labour

14.3   Domestic servitude

14.4   Organ harvesting

14.5   Child related crimes, such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds, etc.

14.6   Forced marriage and illegal adoption (if other constituent elements are present).

Staying Safe Online

1. Online Safety

1.1   We know pupils increasingly work online; it is essential that children are safeguarded from potentially harmful and inappropriate online material. Our Designated safeguarding lead takes lead responsibility for online safety in MPCT.

1.2   The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation, radicalisation, sexual predation; technology often provides the platform that facilitates harm.

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

a. content: being exposed to illegal, inappropriate, or harmful material; for example, pornography, fake news, racist or radical and extremist views;

b. contact: being subjected to harmful online interaction with other users; for example, commercial advertising, as well as adults posing as children or young adults; and

c. conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images, or online bullying;

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

1.4   Where children are being asked to learn online at home, the DfE has provided advice to support schools and colleges do so safely.

1.5   When our Learners use MPCT network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems. However, many Learners are able to access the internet using their own data plan. To minimise inappropriate use, as a college, we will minimise use of personal devices and ensure Learners are aware of Learner anti-bullying policy.

1.6   It is essential that children are safeguarded from potentially harmful and inappropriate online material. MPCT has an effective whole college approach to online safety, which empowers the college to protect and educate Learners and staff in their use of technology, and has established mechanisms to identify, intervene in, and

escalate any concerns, where appropriate.

1.7   MPCT adheres to the IT Security and Internet Usage Policy, which has been written in consideration of Learners on the MPCT programmes/courses, and is aligned with national, regional, and safeguarding policies.

1.8   Learners are made aware of e-safety issues, and are empowered to stay safe. MPCT actively encourages safe practice online. If you are worried about how someone is behaving towards you or someone else online, information on what to do can be found through CEOPS Link.

1.9   If you, as a learner at MPCT, have any concern about your wellbeing, safety, or rights, you should talk to your instructor or a member of staff you trust, or contact our Safeguarding Team via the Head Office 0330 111 3939, or email keepmesafe@ mpct.co.uk.

Staff support

1. Supporting Safeguarding

1.1   We recognise the stressful and traumatic nature of Safeguarding. We will support staff by providing an opportunity to talk through their anxieties with the RDSL or LSO, and to seek further support, as appropriate.

1.2   MPCT Staff with Specific Responsibility for the Safeguarding/Protection of Children and Vulnerable Adults: Training and Support.

1.3   MPCT ensures that the Designated Director, lead Safeguarding Officer, Designated Person, Nominated Deputy, and RDSLs receive training relevant to their role. The organisation must also ensure that all its employees/volunteers are kept informed about Safeguarding issues through a programme of staff information, including regular updates via CEO memos.

1.4   MPCT Lead Safeguarding Officer (LSO) Person for Children and Young People has the main responsibility for managing child and vulnerable adult protection issues within MPCT. The role and responsibilities are detailed as per policy.

1.5   Specific responsibilities in relation to allegations against MPCT Staff members are detailed in the MPCT Disciplinary Procedure and Whistleblowing Policy.

Photographing, Videoing and Filming of Learners

1. Consent

1.1   All MPCT Learners will have consent forms completed, where NOK/Carers sign to confirm they are happy for photographs to be taken to support Learners' course work as evidence, and happy for the photographs to be used in helping promote MPCT activities:

1.2   Where appropriate, all materials promoting MPCT events or activities shall be monitored, and accredited photographers may be used.

1.3   Where possible, consent from the parent/guardian for photographing, videoing, and/or filming of a child or vulnerable adult must be obtained prior to the event or activity, if not covered by initial consent forms completed.

1.4   Where possible, anyone wishing to use photographic/film/video equipment at a venue must obtain the approval of MPCT.

1.5   MPCT reserves the right always to prohibit the use of photography, film, or video at any event or activity with which it is associated.

1.6   The requirements above are publicly promoted to ensure all people present at the event or activity understand the procedure, and are aware of whom to contact if concerned.

Concerns about Photographers, Video, or Film Operators. Any concerns with photographers, or video or film operators, are to be reported to MPCT Director of Risk Management and, where relevant, the Police.

2. Children or Vulnerable Adults in Publications and on the Internet.

2.1   Sport websites and publications provide excellent opportunities to broadcast achievements of individuals to the world, and to provide a showcase for the activities of young people or vulnerable adults. In some cases, however, displaying certain information about children and vulnerable adults could place them at risk. The following procedure must be followed to ensure MPCT publications and information on the Internet do not place Learners and vulnerable adults at risk. MPCT publications and information on the Internet must adhere to the following:

2.2   Publications or information on an Internet site must never include personal information that could identify a Learner, e.g. home address, e-mail address, telephone number of a child or vulnerable adult.

2.3 Any contact information must be directed to either MPCT or another relevant organisation's address.

3. Publishing

3.1 Before publishing any information Learner, written consent must be obtained from the Learner's parent/guardian. If the material is changed from the time of consent, the parents/guardians must be informed, and consent provided for the changes.

3.2 The content of photographs or videos must not depict a Learner in a provocative pose or in a state of partial undress. Learners must never be portrayed in a demeaning or tasteless manner.

3.3 For photographs or videos of groups or teams of children or vulnerable adults, ensure that only the group or team is referred to, not individual members. Credit for achievements by a Learner or vulnerable adult are to be restricted to names known to the college, e.g. Mr M Jones.

3.4 All published events involving Learners must be reviewed to ensure the information will not put Learners at risk.

3.5 Care must be taken in publishing photographs, film or videos of learners who are considered particularly vulnerable e.g. the subject of a child or vulnerable adult protection issue or a custody dispute.

4. Reporting Concerns

4.1 Any concerns or enquiries about publications or Internet information should be reported to the Director of Risk Management, Steve Williams, via stevewilliams@mpct.co.uk.

4.2 The MPCT at Risk Register must be completed by the staff member raising the issue. This will record the date and type of information received, what action was agreed with the Line Manager, the action taken, and any follow up. This will be checked and monitored by the Director of Risk Management.

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Private Fostering

1. Information on Fostering

1.1   A private foster carer is someone other than a parent or a close relative, who cares for a child for a period of 28 days or more, in agreement with the child's parent.

1.2   It applies only to children under 16 years, or under 18 if they are disabled.

1.3   Private foster carers can be part of the child's wider family, a friend of the family, the parents of the child's boyfriend or girlfriend, or someone unknown but willing to foster the child.

1.4   Close relatives, such as a grandparent, a brother or sister, an aunt or an uncle, a step-parent, are not private foster carers.

1.5   Some of the common situations where children are privately fostered are:

a. Where parents are unable to care for their children, for example, if they have chronic ill health, or are in prison.

b. Where children from abroad are sent to stay with relatives, often to improve their education.

c. Teenagers who have broken ties with their parents, and are staying in the short term with friends.

d. Those living with host families whilst taking courses of study.

e. Children's Social Care is not involved in making private fostering arrangements, but is responsible for checking that the arrangements are suitable for the child.

1.6   As a professional, it is our mandatory duty to notify Children's Social Care if you are in contact with a child or young person who is being privately fostered. This will help protect the child against abuse or neglect, and provide some reassurance that the child is being looked after properly.

Information Sharing

1. Information sharing rules

1.1 Below are the seven golden rules to sharing information:

a. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018, and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

b. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

c. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

d. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018, you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

e. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

f. Necessary, proportionate, relevant, adequate, accurate, timely, and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.

g. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom, and for what purpose.

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