



## Inspiring Great British Manufacturing

### Safeguarding Policy

Policy owner: Quality Enhancement, Compliance and Systems Manager

Date Policy Approved: August 2024

Policy Approved By: David Grailey

Job Title: Managing Director – MTC Training

Signature: 

Next Policy Renewal Date: August 2025

Reference number: APP-008-G1 (V16)

The data contained in this document contains proprietary information and it may not be copied or communicated to a third party or used for any purpose other than that for which it was supplied without the MTC's prior written consent. © MTC

## Contents

|                                                                                                                  |           |
|------------------------------------------------------------------------------------------------------------------|-----------|
| <b>1. INTRODUCTION .....</b>                                                                                     | <b>3</b>  |
| 1.1 Our safeguarding policy.....                                                                                 | 3         |
| 1.2. The purpose of this policy is:.....                                                                         | 3         |
| <b>2 COMMUNICATION, TRAINING AND CPD .....</b>                                                                   | <b>3</b>  |
| <b>3 DEFINITIONS .....</b>                                                                                       | <b>4</b>  |
| <b>4 COMMON INDICATORS OF SAFEGUARDING CONCERNS.....</b>                                                         | <b>5</b>  |
| <b>5 INTERNAL AND EXTERNAL POLICIES AND LEGISLATION .....</b>                                                    | <b>6</b>  |
| 5.1 Main policies, procedures, and legislation .....                                                             | 6         |
| 5.2 Additional relevant policies and procedures .....                                                            | 6         |
| 5.3 Welfare.....                                                                                                 | 7         |
| We recognise that:.....                                                                                          | 7         |
| <b>6 KEEPING LEARNERS SAFE .....</b>                                                                             | <b>7</b>  |
| <b>7 MONITORING .....</b>                                                                                        | <b>10</b> |
| <b>8 RESPONSIBILITIES OF SAFEGUARDING LEADS AT MTC TRAINING.....</b>                                             | <b>10</b> |
| 8.1 Designated Safeguarding Lead (DSL) .....                                                                     | 10        |
| 8.2 Deputy Designated Safeguarding Lead and Safeguarding Officers.....                                           | 11        |
| 8.3 Contact Details .....                                                                                        | 11        |
| 8.4 External Agencies .....                                                                                      | 12        |
| <b>APPENDIX 1 SAFEGUARDING DISCLOSURES PROCESS .....</b>                                                         | <b>14</b> |
| Appendix 2 Managing Allegations of Abuse Against Colleagues .....                                                | 15        |
| 2.1 Introduction .....                                                                                           | 15        |
| 2.2 Considerations.....                                                                                          | 15        |
| 2.3 Managing Allegations of Abuse Against Colleagues Process .....                                               | 16        |
| <b>APPENDIX 2 TECHNICAL REQUIREMENTS TO MEET DEPARTMENT FOR EDUCATION DIGITAL AND TECHNOLOGY STANDARDS .....</b> | <b>17</b> |

## 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 members, 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, 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 Committee, Curriculum and Quality Committee and MTC Training Board for approval. Once the policy is approved it is disseminated to MTC Training Colleagues by the Designated Safeguarding Lead (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 MTC Training and OAS websites, and internally on the MTC Training Document Hub SharePoint 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 and Prevent procedures. This will include any amendments to the Keeping Children Safe in Education Act.

2.4 In conjunction with the CPD listed in 2.3, MTC Training colleagues will complete an annual refresh of the Colleague Code of Conduct.

2.5 New colleagues joining MTC Training are required to complete mandatory online training courses within the Right Start induction as instructed by the Training and Compliance Coordinator. Further training is delivered throughout the probation period which is monitored and reviewed by the Designated Safeguarding Lead.

2.6 All learners (apprentices, Skills Boot Camp Students and HE students) will be made aware of this policy during their induction. The policy will be available on Microsoft Teams for all learners, apprentices will be asked to confirm they have read and understood the contents in the *documents I have read* section in Pro Monitor.

2.7 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

The common indicators listed below are signs that all MTC Training colleagues should look for in our learners and those that would benefit from early help. This means taking action to support a child, young person, or vulnerable adult at the early stages of a problem.

- Self-depreciation
- 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
- Learners that are young carers
- Learners that are misusing alcohol and other drugs

In all cases colleagues should speak to the DSL or a member of the Safeguarding Team for further advice.

## 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:

- Children Acts 2004
- The Education Act 2011
- The Education and Training (Welfare of Children) Act 2021
- United Convention of the Rights of the Child Sept 1990
- Data Protection Act 2018
- Human Rights Act 1998
- Sexual Offences Act 2003
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- What to do if you are worried a child is being abused (March 2015)
- Keeping Children Safe in Education: Statutory guidance for schools and colleges 2024
- Counter-Terrorism and Security Act 2015
- Revised *Prevent* Duty Guidance: for England and Wales (Home Office September 2023)
- Working Together to Safeguard Children December 2023
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- 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
- Police Act 1997 (Protection of Vulnerable Adults) Regulations 2013
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2019
- 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:**

- MTC Training Colleague Code of Conduct
- MTC Training Third Party Code of Conduct

- Prevent Policy
- Recruitment, induction and training
- Safeguarding Procedures – Disclosures and Managing Allegations against Colleagues
- Role of the designated safeguarding officer
- Dealing with disclosures and concerns about learner
- Recording and information sharing
- Code of conduct for colleagues
- Safer recruitment
- E-safety
- Anti-bullying
- Complaints
- Whistleblowing
- Health and Safety
- Training, supervision and support
- Lone working policy and procedure
- Quality assurance

## 5.3 Welfare

We recognise that:

- The welfare of children and young people is paramount, as enshrined in the Children Acts 1989 and 2006.
- 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.
- Some learners are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.
- 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:

- Promoting and maintaining a culture of safeguarding throughout MTC Training and associated partnerships.

- 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 Designated Safeguarding Lead (DSL) for learners, Designated Safeguarding Officers and a Lead Board member 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. 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 type of bullying that does arise, such as physical, mental or use of technology/cyber/online.
- Collaborating with MTC IS colleagues on the MTC Training Digital Strategy to continue to monitor e-safety practices and procedures to ensure learners are able to access online and virtual learning and information with appropriate protection.
- Carrying out filtering and monitoring of apprentices' internet use by our IS Team, with agreed 'flags' that may indicate vulnerabilities or worrying changes in behaviour being reported to the DSL for escalation. An annual declaration will be completed by the Head of IT Infrastructure & Operations and DSL to confirm that the technical requirements listed in Appendix 3 has been met, this will also be signed off by the MTC Training Managing Director.
- 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 website.
- 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 Designated Safeguarding Lead, 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 Committee, which includes representatives from colleagues, employer partners and a member of the Governing Body.
- Ensuring that the MTC Training Board and Safeguarding Committee review the effectiveness of our safeguarding policy, practice, and procedures annually, in order to incorporate changes and updates in legislation and recommended practice.

## 7 Monitoring

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

7.2 The Safeguarding Team and Safeguarding Committee are responsible for monitoring all activities that are in scope within this policy and making recommendations for improvement.

## 8 Responsibilities of Safeguarding Leads at MTC Training

### 8.1 Designated Safeguarding Lead (DSL)

MTC Training's Designated Safeguarding Lead (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 MTC Training Board Meetings, with Safeguarding Committee 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 Designated Safeguarding Lead 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

## 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): Dave Lee
- Deputy Designated Safeguarding Lead (DDSL): James Wagstaff
- Safeguarding Officer (SO) AMTC: Donna Mason
- Safeguarding Officer (SO) AMTC: Sarah Ross
- Safeguarding Officer (SO) AMTC: Rachel Bradford
- Safeguarding Officer (SO) OAS: Lindsey Baldwin
- Safeguarding Officer (SO) OAS: Mark Dickson
- Safeguarding Officer (SO) OAS: Debbie Watson
- Safeguarding Officer (SO) OAS: Madeleine Snook-Dunn
- Safeguarding Officer (SO) Liverpool: Keiron Smith

- Email: [safeguarding@the-mtc.org](mailto:safeguarding@the-mtc.org)
- 24 Hour Safeguarding Hotline: 02476701635

## 8.4 External Agencies

Coventry Safeguarding Children Partnership and Adult Safeguarding Board:

- Email: [CoventryCSCP@coventry.gov.uk](mailto:CoventryCSCP@coventry.gov.uk)
- Tel: 02476975477

Coventry City Council Multi Agency Safeguarding Hub (MASH):

- Email: [mash@coventry.gov.uk](mailto:mash@coventry.gov.uk)
- Tel: 02476788555

Coventry Safeguarding Adults Board:

- Email: [CoventrySAB@coventry.gov.uk](mailto:CoventrySAB@coventry.gov.uk)
- Tel: 02476796477

West Midlands Police Child Abuse Investigation Unit:

- Tel: 02476539044

West Midlands Police safeguarding Adult Services:

- Tel: 0121 101 EXT: 8811 3255/3226/3278

Oxford Safeguarding Children Board:

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

Oxfordshire County Council Multi Agency Safeguarding Hub (MASH):

- Email: [mash-children@oxfordshire.gov.uk](mailto:mash-children@oxfordshire.gov.uk)
- Tel: 03450507666

Oxfordshire Safeguarding Adults Board

- Email: [mash-children@oxfordshire.gov.uk](mailto:mash-children@oxfordshire.gov.uk)
- Tel: 03450507666 or 0800833408 (out of office hours)

Liverpool Safeguarding Children Partnership:

- Tel: 01512330493/0510

Liverpool Children's Services Careline:

- Tel: 01512333700

Liverpool Children's Advice & Support Service (CASS):

- Tel: 01514592606

Liverpool Children at Risk (MARF referrals)

- Tel: 01514592606
- Online referral [Children at risk \(MARF referrals\) - Liverpool City Council](#)

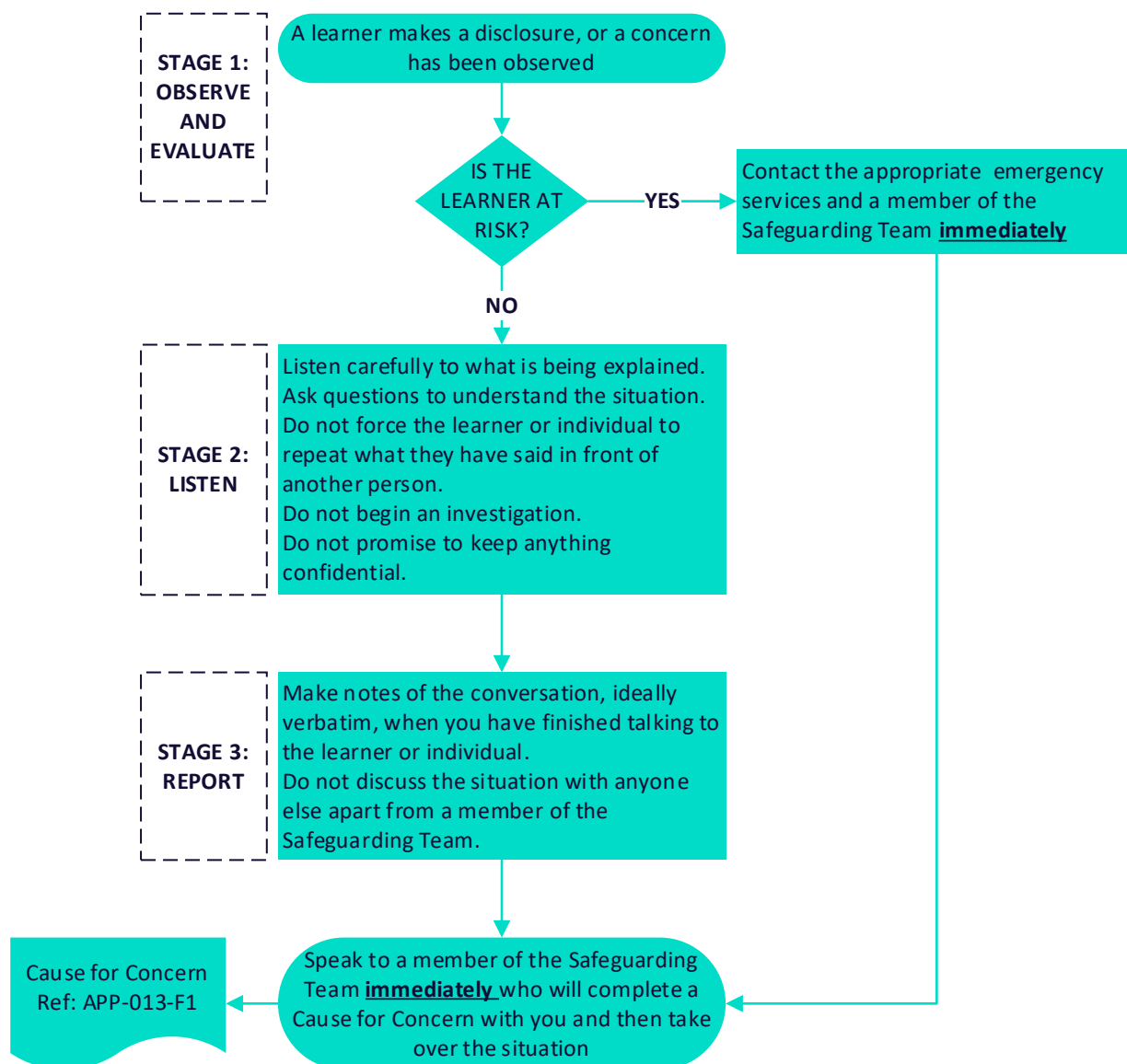
Liverpool Safeguarding Adults:

- Tel: 01512332800

Merseyside Police:

- Tel: 01512256651
- Website: <http://www.merseyside.police.uk/>

## 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 what you saw and heard, not what you think

## Appendix 2 Managing Allegations of Abuse Against Colleagues

### 2.1 Introduction

This procedure applies to all learners 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 Operations Ltd 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).

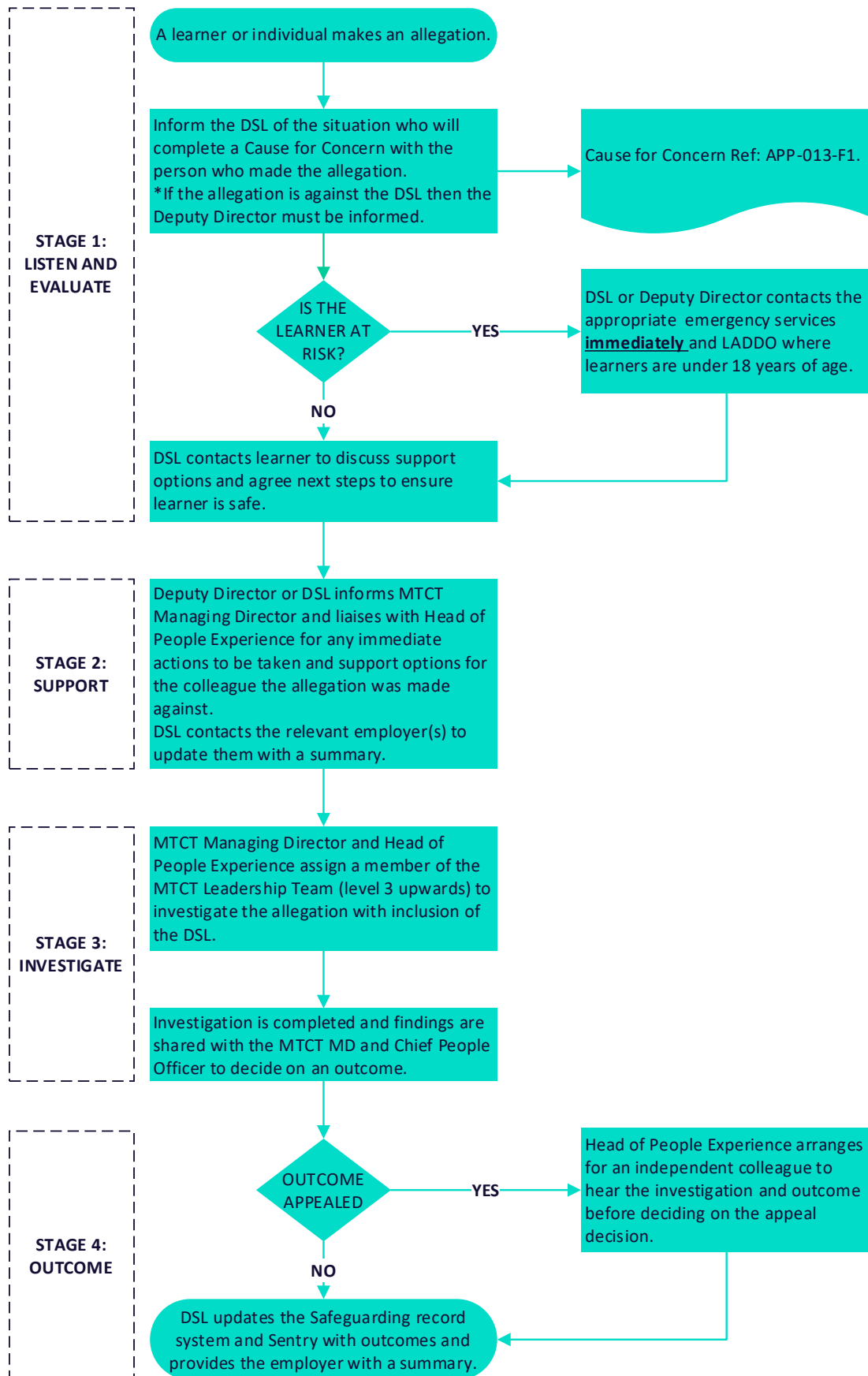
Due to the frequent contact with young people and vulnerable adults, colleagues in MTC Training may have allegations of abuse made against them and, in rare instances, such allegations may be true. MTC Training recognises that an allegation of abuse may be made for a variety of reasons and that the facts 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 three important aspects to consider:



## 2.3 Managing Allegations of Abuse Against Colleagues Process





## Appendix 2 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