



Safeguarding Policy

Introduction

The purpose of this safeguarding policy is:

- to protect children, young people and adults (including vulnerable adults) who work with MBKB from harm. This includes the children of adults who work with us
- to provide staff and volunteers, as well as children, young people and their families, with the overarching principles that guide our approach to child protection. This policy applies to anyone working on behalf of MBKB, including the senior management team and the board of Governors, paid staff, volunteers, agency or associate staff and students.
- to raise awareness for all team members of their responsibilities in identifying and reporting safeguarding concerns. It also ensures structured procedures are understood by team members and followed in cases where harm or abuse is suspected.
- To promote wellbeing for children, young people, and all adults MBKB work with.

MBKB promote this policy at all times by encouraging safe working practices and raising awareness of safeguarding amongst all team members, employers, apprentices and third parties. MBKB are committed to ensuring our safeguarding policies and procedures are compliant with current legislation and guidance.

The Children Act 1989, defines a child as 'anyone who has not yet reached their 18th birthday, even if they are living independently, are a member of the armed forces or is in hospital.

Legal Framework

This policy has been drawn up on the basis of legislation, policy and guidance that seeks to protect children, young people and adults (including vulnerable adults) in England. This legislation and guidance includes:

- 'Keeping Children Safe in Education' – 'KCSIE' – (DfE, September 2020, and updates Jan 2021)
- 'Working Together to Safeguard Children' (DfE, July 2018)
- 'What to do if you're worried a child is being abused – advice for practitioners' (March 2015)
- The Children's Act 1989 and 2004
- The Education Act 2002
- Sexual offences Act 2003
- The Care Act 2014
- 'Signs, symptoms and effects of child abuse and neglect', NSPCC factsheet (<https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>)
- West Midlands Child Protection and Safeguarding Procedures Manual (<http://westmidlands.procedures.org.uk/>)
- Safeguarding Vulnerable Groups Act 2006
- Modern Slavery Act 2015



- West Midlands 'see me hear me' framework (<https://www.seeme-hearme.org.uk/>)
- Malicious Communications Act 1988
- General Data Protection Regulation 2018

A summary of the key legislation is available from [nspcc.org.uk/learning](https://www.nspcc.org.uk/learning).

Supporting Documents

This policy statement should be read alongside our organisational policies, procedures, guidance and other related documents, including:

- Whistleblowing policy
- Prevent Policy
- Social Media and E-safety policy
- Employee IT policy
- IT acceptable use policy
- Safer recruitment and selection policy
- Anti Bullying Policy
- Code of Conduct
- Managing allegations including complaints

Safeguarding Training (MBKB Staff, Employers and Learners) and Safeguarding Reports

At staff induction, team members are trained on and introduced to this policy. They are also issued with a team handbook and copy of all our policies. Prior to team meetings, team members complete a safeguarding questionnaire, answers are then analysed and specific safeguarding training is then designed and delivered at the team meeting based on this. Team members are also updated on changes in practice, legislation and any new/ further guidance. Quarterly safeguarding reports are created quarterly by our Safeguarding Manager for dissemination into our Senior Team Meetings and shared with the Board of Governors. This report will identify any trends in safeguarding issues and any training needs for MBKB staff members. This ensures a 'joined-up' approach to safeguarding our learners. In addition to this, once cases/ concerns are closed, the safeguarding team reviews conclusions and impact of measures taken to ensure continuous monitoring and evaluation of safeguarding procedures.

All team members, including volunteers or temporary staff, undertake Safeguarding children and adults training within their induction period at MBKB. This is refreshed every 2 years. Members of the Safeguarding team undertake 'Further child protection' training and this is refreshed every 2 years. Members of the Safeguarding team, along with several members of the Senior Team, have also completed Mental Health qualifications.

As part of our employer onboarding process, all employers are required to complete the MBKB ONA (Organisational Needs Analysis). Within this we question their understanding of and commitment to safeguarding, the results are analysed and, when required, they are trained by our Safeguarding Lead. Each employer must also commit to comply with our Safeguarding policy, as detailed in our Apprenticeship Services agreement.



Within our Onboarding phase we issue and explain our Safeguarding policy as part of a detailed induction, to both the Apprentice and Employer; a copy of our policy is also stored in the e-portfolio system we use.

Throughout the program, at every 12 weekly progress review, we discuss safeguarding, giving examples relevant to that topic and questioning apprentices' and employers' understanding; We record these on our review documents. In addition to this, safeguarding and welfare/wellbeing discussions are regularly embedded within sessions and opportunities to do so are seized.

Safeguarding knowledge and awareness are further checked by our Quality Assurance Team when they carry out observations and also by our customer surveys, the results of both these feed into our 360 degree monitoring.

Safeguarding Team at MBKB

MBKB has three Designated Safeguarding Officers; A lead and two deputies. We also have a designated email address which is monitored 24/7 – welfare@mbkbgroup.com. A copy of this policy is on our website and widely available to all parties we work with.

MBKB Safeguarding Manager (Designated Lead) - Katie Biggs

MBKB Deputy designated safeguarding leads – Julie Fellows and Danni Northall

Lead Board of Governors for Safeguarding- David Guy

Senior Management Team with further child protection training (in addition to safeguarding team) - Lisa Elcocks and Sarah Watkins

Team members with Mental Health First Aid Training- Katie Biggs, Sarah Watkins, Danni Northall, Lisa Elcocks and Julie Fellows

It must be recognised that, despite specific safeguarding roles listed above, all individuals have a duty to safeguard children, and the child's safety and welfare is paramount. Therefore it is your duty and responsibility to ensure that you report any concerns immediately, following the procedure listed within this policy.

MBKB believe and recognise that:

- Children, young people and adults should never experience abuse of any kind
- MBKB have a responsibility to promote the welfare of all children, young people and adults (including vulnerable adults), to keep them safe and to practise in a way that protects them.
- The welfare of children is paramount in all the work we do and in all the decisions we take
- All children, regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation have an equal right to protection from all types of harm or abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues



- Working in partnership with children, young people, apprentices, employers and other agencies is essential in promoting young people's welfare
- The importance of working together as a team to safeguard children and vulnerable adults, and accept the shared sense of responsibility across all agencies working with children and adults to safeguard them. We appreciate the vital importance of a 'joined up approach', and our safeguarding team has received detailed training on making safeguarding referrals.

MBKB will seek to keep children, young people and adults (including vulnerable adults) safe by:

- Valuing, listening to and respecting them
- Appointing a Designated Safeguarding Lead for Children, Young people and adults, a deputy lead and a Lead board of Governors member for safeguarding
- Adopting child protection and safeguarding best practice through our policies, procedures and code of conduct for staff and volunteers
- Developing and implementing an effective online safety policy and related procedures
- Providing effective management for staff and volunteers through supervision, support, training and quality assurance measures so that all staff and volunteers know about and follow our policies, procedures and behaviour codes confidently and competently
- Recruiting and selecting staff and volunteers safely, ensuring all necessary checks are made
- Recording, storing and using information professionally and securely, in line with data protection legislation and guidance
- Sharing information about safeguarding and good practice with learners and their employers within sessions, 12 weekly reviews and by sharing resources.
- Making sure that staff members, learners and employers know where to go for help if they have a concern
- Using our safeguarding and child protection procedures to share concerns and relevant information with agencies who need to know, and involving children, young people and adults where appropriate.
- Using our procedures to manage any allegations against staff and volunteers appropriately
- Creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise
- Ensuring that we have effective complaints and whistleblowing measures in place
- Building a safeguarding culture where staff and volunteers, children, young people and adults, treat each other with respect and are comfortable about sharing concerns.

Reporting Safeguarding Concerns

In the case that you have concerns relating to safeguarding or the welfare of an individual, please follow the steps below.

- Complete an L007 Safeguarding Incident Report form, detailing all of your concerns. This may be concerns that have arisen from a direct disclosure, an



indirect disclosure, concerns shared by another person with you or something you have witnessed.

- Make a detailed note of the date, time, place, what the person said, did and your questions etc on an MBKB Safeguarding Incident Report form. Include exact quotes where possible. Information should be recorded as soon as possible to ensure accuracy. Staff should not investigate concerns or allegations themselves but should report them immediately to the Designated safeguarding Lead.
- Safeguarding Incident Report forms must be passed onto the DSL within 24 hours. Particular attention may have to be given to those with speech impediments, as these can make communication difficult. In addition, this applies to people whose first language is not English and it is important to consider any cultural differences when a disclosure is made.

If a direct disclosure is made:

- Listen carefully and stay calm
- Do not interview the person, but question normally and without pressure in order to be sure that you understand what they are telling you.
- Do not put words into the person's mouth.
- Reassure the person that, by telling you, they have done the right thing.
- Inform the person that you must pass the information on, but that only those that need to know about it will be told, for example, the designated safeguarding lead and any potential witnesses. Never promise to keep it a secret.

MBKB's safeguarding team will review the L007 Safeguarding Incident Report Form and take the appropriate action, whether that be making a referral to an external agency or providing in-house support.

MBKB will comply with GDPR and data protection act 2018 when sharing information relating to a disclosure or concern for welfare. We follow 7 golden rules for information sharing

1. Remember the Data Protection Act 2018 and GDPR are not a barrier to sharing information
2. Be open and honest
3. Seek advice
4. Share with consent where possible and appropriate
5. Consider safety and well-being
6. Necessary, proportionate, relevant, accurate, timely and secure
7. Keep a record

If you think a child or young person is at risk or being abused or neglected, you can also contact the children's social care team at their local council. If you do not know where they live, contact your local council's team, the NSPCC or the Police for advice. Use the link below to find the appropriate safeguarding partner in the child's local area.

<https://www.gov.uk/report-child-abuse-to-local-council>



Vulnerable Adults

Who is a Vulnerable Adult? - The broad definition of a 'vulnerable adult' referred to in the 1997 Consultation Paper Who decides? Issued by the Lord Chancellor's Department, is a person:

'who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation'. It must not be forgotten, however, that any adult could potentially be the victim of abuse.

All MBKB learners complete a 'barriers to progress' checklist as part of their induction, and embedded within this, are factors that would indicate if the learner is vulnerable. Should a learner be rated as amber or green, the Safeguarding Team are notified and the appropriate support is provided, including safeguarding referrals where necessary.

Contact Details

Designated Safeguarding Lead/ Safeguarding Manager

Name: Katie Biggs

Phone: 07940353947

Email: Katie@mbkbgroup.com

Deputy Safeguarding lead(s)

Name: Danni Northall

Phone: 07957220374

Email: Dani@mbkbgroup.com

Name: Julie Fellows

Phone: 07432315672

Email: Julie@mbkbgroup.com

Board of Governors Member for Safeguarding

Name: David Guy

Email: dg@mbkbgroup.com

NSPCC Helpline 0808 800 5000

Types of abuse

Physical Abuse – This may include 'hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions'. 'Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. This situation is commonly described using terms such as



factitious illness by proxy or Munchausen syndrome by proxy.' According to NSPCC, Physical abuse symptoms include:

- bruises
- broken or fractured bones
- burns or scalds
- bite marks.

It can also include other injuries and health problems, such as:

- scarring
- the effects of poisoning, such as vomiting, drowsiness or seizures
- breathing problems from drowning, suffocation or poisoning.

Head injuries in babies and toddlers can be signs of abuse so it's important to be aware of these. Visible signs include:

- swelling
- bruising
- fractures
- being extremely sleepy or unconscious
- breathing problems
- seizures
- vomiting
- unusual behaviour, such as being irritable or not feeding properly.

Sexual Abuse – This may include 'rape and sexual assault or sexual acts to which the vulnerable adult has not consented or could not consent or was pressured into consenting.' Sexual abuse also includes forcing a person to look at pornographic materials taking indecent photographs. There are two types of sexual abuse- contact and non contact.

Contact abuse is where an abuser makes physical contact with a child. This includes:

- sexual touching of any part of a child's body, whether they're clothed or not
- using a body part or object to rape or penetrate a child
- forcing a child to take part in sexual activities
- making a child undress or touch someone else.

Contact abuse can include touching, kissing and oral sex – sexual abuse isn't just penetrative.

Non-contact abuse is where a child is abused without being touched by the abuser. This can be in person or online and includes:

- exposing or flashing
- showing pornography
- exposing a child to sexual acts
- making them masturbate
- forcing a child to make, view or share child abuse images or videos
- making, viewing or distributing child abuse images or videos
- forcing a child to take part in sexual activities or conversations online or through a smartphone.

Indicators may include:

- Avoiding being alone with or frightened of people or a person they know
- Using sexual language or displaying behaviours you wouldn't expect them to know
- Frequent nightmares or bed wetting
- substance misuse (alcohol, drugs etc)
- Self harm behaviours
- changing in eating habits or an unhealthy relationship with food
- changes in mood.

If a child is being or has been sexually abused online, they might:

- spend a lot more or a lot less time than usual online, texting, gaming or using social media
- seem distant, upset or angry after using the internet or texting
- be secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet.

Emotional/Psychological – This may include threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.

Indicators may be:

- Using inappropriate language
- Struggling to control emotions
- seeming isolated
- lacking social skills
- have few or no friends
- being overly affectionate
- seeming unconfident/ embarrassed/ withdrawn/ low self esteem

Financial or Material Abuse – This may include 'theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse of misappropriation of property, possessions or benefits.'



Indicators may include:

- unexplained money loss
- lack of money to pay for essentials such as food, bills and rent
- Inability to access or check bank accounts and bank balance
- Changes or deterioration in standards of living e.g. not having items or things they would usually have
- Unusual or inappropriate purchases in bank statements
- Isolation and withdrawal from friends and family
- Lack of things you'd expect someone to be able to afford e.g. TV, grooming items, clothing

Neglect and Acts of Omission – This may include ‘ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, the withholding of the necessities of life, such as medication, adequate heating and nutrition.’

Indicators of neglect may include:

- poor appearance or poor hygiene
- appearing withdrawn
- health issues or slow development
- changes in behaviour such as becoming depressed, angry, clingy, obsessive behaviours
- appearing hungry all the time
- Malnutrition
- unsafe living conditions
- untreated medical issues
- inadequate clothing

Self neglect - Self neglect is ignoring one's own basic needs. Common signs of self-neglect include poor personal hygiene, little regard for general health and a proclivity towards hoarding or other such obsessional behaviours.

Indicators may include:

- Poor hygiene
- Malnutrition
- unsafe living conditions
- untreated medical issues
- inadequate clothing

Discriminatory Abuse – This may include abuse, bullying and harassment based on the individual's age, sex, disability, religion, race or ethnicity or sexual orientation.’ Some of the recognised signs of discriminatory abuse might be very similar to emotional and psychological abuse.

Indicators may include:

- The person appearing withdrawn and isolated
- Expressions of anger, frustration, fear or anxiety
- Lack of respect shown to an individual



- Signs of a sub-standard service being offered to a person
- Repeated exclusion from rights afforded to citizens such as health, education, employment

Organisational Abuse- This type of abuse involves an abuse of power and comes from those who should be offering a safe and nurturing environment. It includes neglect and poor care practice within an institution or specific care setting. This may range from one off incidents to on-going ill-treatment.

Indicators may include:

- An unsafe, unhygienic or overcrowded environment.
- A strict or inflexible routine.
- Lack of privacy, dignity, and respect for people as individuals.
- Withdrawing people from community or family contacts.
- No choice offered with food, drink, dress or activities.
- No respect or provisions for religion, belief, or cultural backgrounds.
- Treating adults like children, including arbitrary decision-making.

Domestic Abuse -This type of abuse is an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence, in the majority of cases by a partner or ex-partner, but also by a family member or carer. This is a very common type of abuse. It is a pattern of behaviour in any relationship that is used to gain or maintain power or control over an individual.

Indicators may include:

- aggression or bullying
- anti-social behaviour, like vandalism
- anxiety, depression or suicidal thoughts
- attention seeking
- bed-wetting, nightmares or insomnia
- constant or regular sickness, like colds, headaches and mouth ulcers
- drug or alcohol use
- eating disorders
- problems in school or trouble learning
- tantrums
- withdrawal.

Modern Slavery / Anti-Slavery

This policy is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that MBKB has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour. MBKB has a zero-



tolerance approach to any form of modern slavery. We are committed to acting ethically, with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Indicators may include:

- They may look uneasy, unkempt, or malnourished.
- They may have untreated injuries.
- Someone paying for their travel
- Someone speaking for them
- Perhaps they are picked up and dropped off from work at unusual times
- They may not be sure of their own address
- When you change the way you look at things, the things you look at change.

We operate a number of policies to ensure that we are conducting business in an ethical and transparent manner. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

Our Employers

MBKB operates an Employer vetting policy, utilising the Organisational Needs and Policy Analysis (ONAPA) document and maintains a preferred list. We conduct due diligence on all employers and organisations before allowing them to become access to our training and services. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery [and on-site audits which include a review of working conditions]. Our anti-slavery policy forms part of our contract with all employers and organisations and they are required to confirm that no part of their business operations contradicts this policy. In addition to the above, as part of our contract with employers, we require that they confirm to us that; they pay their employees any prevailing minimum wage applicable and provided suitable working conditions, the must also adhere to all our policies, as outlined at sign up. We reserve the right to terminate the contract at any time should any instances of modern slavery come to light.

Fabricated/ Induced Illness



Fabricated or induced illness (FII) is a form of child abuse where a parent or carer exaggerates or deliberately causes symptoms of illness in the child. It is also known as “Munchausen’s syndrome by Proxy”.

MBKB recognises this as a form of child abuse and team members are able to recognise and respond to concerns relating to this type of abuse.

Child Trafficking

Child trafficking is a form of child abuse. It involves the recruiting, moving, receiving and harbouring of children with the purpose of exploiting them (HM Department for Education, 2011). Child trafficking is a form of modern slavery.

Children are trafficked for:

- child sexual exploitation
- criminal activity, including:
 - cannabis cultivation
 - street crime - such as pickpocketing, begging and bag theft
 - moving drugs
 - benefit fraud
 - immigration fraud
 - selling pirated goods, such as DVDs
- forced marriage
- domestic servitude, including:
 - cleaning
 - childcare
 - cooking
- forced labour, including working in:
 - restaurants
 - nail bars
 - factories
 - agriculture
- illegal adoption
- unreported private fostering arrangements (for any exploitative purpose).

This list is not exhaustive and children who are trafficked are often exploited in more than one way. MBKB recognises child trafficking as a form of child abuse and takes steps to protect children who may be affected by it. Staff and volunteers are able to recognise and respond appropriately to the indicators of child trafficking

Peer on peer abuse

At MBKB we recognise that any type of abuse may not necessarily be perpetrated by an adult; Peer on peer abuse is when children or young people abuse other children or young people. It is important this is not seen as ‘banter’ or less serious as abuse perpetrated by adults. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;



- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals. (KCSIE 2019)

MBKB recognise peer on peer abuse as a form of child abuse and takes steps to protect children who may be affected by it. Staff and volunteers are able to recognise and respond appropriately to the indicators of peer on peer abuse.

Honour Based Violence

These types of violent acts are committed to protect or defend the honour of a family and can involve many different types of abuse. HBV may include FGM, breast ironing and forced marriage. Breast ironing is where young pubescent females have their breasts ironed or flattened down using heated objects in the view that this will protect them from harm such as abduction, rape and sexual harassment. Both FGM and breast ironing are harmful cultural practices and are child abuse. If an MBKB staff member suspects HBV or any other forms of abuse, they are to follow the reporting procedures outlined within the 'reporting safeguarding concerns' section of this policy.

MBKB recognises that forced marriage is illegal and takes steps to protect individuals affected by it. MBKB team members are able to recognise and respond appropriately to any concerns about forced marriage.

FGM - Female Genital Mutilation

Female genital mutilation (FGM) is the partial or total removal of the external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. FGM is often performed by someone with no medical training who uses instruments such as a knife, scalpel, scissors, glass or razor blade. Children are rarely given anaesthetic or antiseptic treatment and are often forcibly restrained.

FGM is recognised as a form of abuse and MBKB takes steps to protect those at risk. All staff and volunteers know how to identify and respond to concerns about FGM and tutors understand their mandatory duty to report FGM.

MBKB proactively raise awareness of FGM amongst team members, volunteers, learners and employers.

Child sexual exploitation

Child sexual exploitation (CSE) is a type 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 (Department for Education, 2017; Nldirect, 2018; Scottish Government, 2018; Wales Safeguarding Procedures Project Board, 2019).

Children and young people in sexually exploitative situations and relationships are persuaded or forced to perform sexual activities or have sexual activities performed on



them in return for gifts, drugs, money or affection. CSE can take place in person, online, or using a combination of both.

MBKB recognises child sexual exploitation as a form of child abuse and takes steps to protect children affected by it. MBKB staff and volunteers are able to recognise and respond appropriately to concerns about child sexual exploitation.

Covid-19 safeguarding update

MBKB are taking steps to ensure that our team, learners, employers and anyone else we come into contact with are kept as safe as possible. In an attempt to limit the spread of the virus, all work concerning MBKB, including apprenticeship and management meetings, are being conducted remotely, online or via telephone, until the 30th May 2021, at which point a review will be carried out, this may result in some relaxation of the online only rule. Updates will be issued to all team members and clients.

We are having regular wellbeing discussions with learners and team members and providing safeguarding support where necessary. MBKB recognise these are unprecedented times and that feelings of uncertainty and anxiousness may be increased. We are committed to promoting positive mental health and wellbeing during these times.

Please refer to the following UK government link for more information on high-risk locations:

<https://www.gov.uk/guidance/coronavirus-covid-19-information-for-the-public#number-of-cases>.

Dependent upon how this outbreak progresses, it may be necessary to extend these measures. This policy will be updated accordingly.

This policy is next due to be reviewed on 26/03/2022, or prior to this if there are changes to relevant legislation or guidance.

Name – Mark Bremner

A handwritten signature in black ink, appearing to read 'Mark Bremner', is enclosed in a thin black rectangular box.