




# The Mantra Group Child Protection and Safeguarding Policy

Policy owner	Quality Dept
Policy Status	LIVE
Policy Version	3
Approved by	D Hewitt
Approval Date	13/02/24
Review Date	12/02/25
Distribution	All Staff
Signed Mark Currie, Chief Executive	
Brief summary of changes	<p>This policy has increased in overall volume. This reflects the fact that Keeping Children Safe in Education 2023 (available <a href="#">here</a>) has increased to over 170 pages (the guidance was 57 pages in 2015).</p> <p>The changes made to KCSIE 2023 can be found in Annex F of KCSIE 2023.</p> <p>This policy has taken into account a review of the learner behaviour policy and staff code of conduct. Awareness of filtering and monitoring has been increased. Cyber security standards have been reviewed. In addition, the safer recruitment policy has been reviewed.</p>

## CONTENTS

<b>SECT REF</b>	<b>TITLE</b>	<b>PAGE NO</b>
<b>A.</b>	<b>Key Safeguarding Personnel</b>	<b>2</b>
<b>B.</b>	<b>Aims</b>	<b>2</b>
<b>C.</b>	<b>Legislation and Statutory guidance</b>	<b>2</b>
<b>D.</b>	<b>Definitions</b>	<b>3</b>
<b>E.</b>	<b>Equality statement</b>	<b>4</b>
<b>F.</b>	<b>Roles and responsibilities</b>	<b>4</b>
<b>G.</b>	<b>All staff</b>	<b>5</b>
<b>H.</b>	<b>The Designated Safeguarding Lead (DSL)</b>	<b>5</b>
<b>I.</b>	<b>Governance</b>	<b>6</b>
<b>J.</b>	<b>The Chief Executive Officer</b>	<b>6</b>
<b>K.</b>	<b>Partner and Members (local and national)</b>	<b>6</b>
<b>L.</b>	<b>Confidentiality</b>	<b>7</b>
<b>M.</b>	<b>Recognising abuse and taking action</b>	<b>7</b>
<b>N.</b>	<b>Onsite and Online safety and the use of mobile technology</b>	<b>13</b>
<b>O.</b>	<b>Learners with special educational needs, disabilities, or health issues</b>	<b>16</b>
<b>P.</b>	<b>Learners with a social worker</b>	<b>16</b>
<b>Q.</b>	<b>Looked-after and previously looked-after children</b>	<b>16</b>
<b>R.</b>	<b>Complaints and concerns about safeguarding policies</b>	<b>17</b>
<b>S.</b>	<b>Record-keeping</b>	<b>17</b>
<b>T.</b>	<b>Training</b>	<b>17</b>
<b>U.</b>	<b>Monitoring arrangements</b>	<b>19</b>
<b>V.</b>	<b>Appendix 1: Types of abuse</b>	<b>19</b>
	<b>Appendix 2: Safer recruitment and DBS checks – policy and procedures</b>	<b>21</b>
	<b>Appendix 3: Allegations of abuse made against staff</b>	<b>26</b>
	<b>Appendix 4: Specific safeguarding issues</b>	<b>32</b>
	<b>Appendix 5: Local area internal and external safeguarding contacts</b>	<b>39</b>
	<b>Appendix 6: Regional area internal and external safeguarding contacts</b>	<b>43</b>
	<b>Appendix 7: Safeguarding Referral Form</b>	<b>44</b>

## A. Key Safeguarding Personnel

Designated Safeguarding Lead (DSL) <b>Mantra Learning</b>	Kay Hadfield <a href="mailto:kay.hadfield@mantralearning.co.uk">kay.hadfield@mantralearning.co.uk</a> Tel: 0333 220 6646
Designated Safeguarding Lead (DSL) <b>National Logistics Academy</b>	Paul Wilde <a href="mailto:paul.w@mantralearning.co.uk">paul.w@mantralearning.co.uk</a> Tel: 0333 220 6646
<b>Deputy DSL</b>	Jemima Moran <a href="mailto:Jemima.m@mantralearning.co.uk">Jemima.m@mantralearning.co.uk</a> Tel: 0333 220 6646
<b>Local Authority Designated Officer (LADO) Rochdale</b> <b>Other areas attached</b>	Louise Hurst 0300 3040350 <a href="mailto:lado@rochdale.gov.uk">lado@rochdale.gov.uk</a>
<b>Children's Social Care referrals: Multi-Agency Safeguarding Hub (MASH)</b>	List attached Appendix 5
<b>Channel Helpline</b>	List attached Appendix 5
<b>Mantra Group Safeguarding Email</b>	<a href="mailto:safe@mantralearning.co.uk">safe@mantralearning.co.uk</a> <a href="mailto:safe@logisticsacademy.co.uk">safe@logisticsacademy.co.uk</a>
<b>Mantra Group Emergency Safeguarding Phone Number</b>	07854722219

## B. Aims

The Mantra Learning Group aims to ensure that:

- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.
- Appropriate action is taken in a timely manner to safeguard and promote children, young people and vulnerable adults' welfare.

## C. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2023).

This policy is also based on the following legislation:

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- The Children and Social Work Act 2017 (Safeguarding of children, chapter 2).
- The Safeguarding Vulnerable Groups Act 2006.

- Working Together to Safeguard Children 2018 (Safeguard and promote the welfare of children).
- Education and Training (Welfare of Children) Act 2021.
- The Human Rights Act 1998.
- The Equality Act 2010.
- The Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015.
- The Rehabilitation of Offenders Act 1974.
- Statutory guidance on the Prevent Duty, which explains duties under the Counter-Terrorism and Security Act 2015.
- The Public Sector Equality Duty (PSED).
- The Care Act 2014.

**Other policies related are:**

- Health and Safety Policy
- Whistle Blowing Policy
- Safer Recruitment
- The Prevent Duty Policy
- Sexual Harassment Policy
- Equality and Diversity Policy
- Learner Behaviour and Attendance Policy
- SEND Policy
- Staff Code of Conduct
- Complaints Policy
- Online safety – Acceptable Use Policy

**D. Definitions**

**Safeguarding and promoting the welfare of children, young people and vulnerable adults (our learners) means:**

- Protecting learners from maltreatment
- Preventing impairment of learner’s mental and physical health or development
- Ensuring that learners grow and develop in circumstances consistent with the provision of safe and effective care
- Taking action to enable all learners to have the best outcomes

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a learner and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and 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. Appendix 1 defines neglect in more detail.

**Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where learners share nude or semi nude images, videos, or live streams.

**Children** includes everyone under the age of 18.

**Learner** includes everyone that is accessing training, this can include funded and un-funded provision.

The following three safeguarding partners are identified in Keeping Children Safe in Education. They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The Local Authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

**Victim** in this policy refers to the person that has suffered abuse. We recognize that not all learners wish to be referred to as a victim.

**Alleged perpetrator(s)** and **perpetrator(s)** in this policy refers to the person (or alleged person) that has initiated and/or carried out the abuse.

## **E. Equality statement**

Some learners have an increased risk of abuse, and additional barriers can exist for some learners with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise learner's diverse circumstances. We ensure that all learners have the same protection, regardless of any barriers they may face.

We give special consideration to learners who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education

## **F. Roles and responsibilities**

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, contractors, associates, volunteers and governors in the group and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended and off-site activities.

The Mantra Group plays a crucial role in preventative education. This is in the context of a whole-group approach to preparing learners for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, and sexual

violence/harassment. This will be underpinned by our related policies detailed in section C. The Mantra Group intend on creating a culture of safeguarding with these policies in mind.

#### **G. All staff will:**

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.
- Read and understand all related policies, and review these at least annually. Specific understanding of the learner behaviour, attendance policy and staff code of conduct should be ensured.
- Sign a declaration after each annual review or as required following appropriate changes.
- Reinforce the importance of online safety when communicating with learners. This must include an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring at induction.
- Provide a safe space for learners who are learning with the Mantra Group both face to face or virtually to speak out and share concerns.
- Receive regular updates (including online safety) via email, newsletter and staff meetings or CPD.

#### **H. The Designated Safeguarding Lead (DSL)**

The DSLs are a member of the senior leadership team. Our DSLs are Kay Hadfield, General Manager and Paul Wilde, Sales and Marketing Director. The DSLs take lead responsibility for child protection and wider safeguarding within the Mantra Group.

The DSLs or deputy DSL (Jemima Moran) will be available during learning hours for staff to discuss any safeguarding concerns. If the DSL and Deputy DSL are not available, the safeguarding team listed above, act as cover.

Kay Hadfield or Paul Wilde can be contacted out of hours, if necessary, via e-mail ([safe@mantralearning.co.uk](mailto:safe@mantralearning.co.uk)) and staff can register any safeguarding concerns for learners at any time to alert the Safeguarding Team.

The DSL will be given the time, funding, training, resources, and support to:

- Provide advice and support to other staff on child, learner welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children and learners, particularly during on boarding or when identified later and intervention is needed or a risk assessment should be carried out
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour.

- Update and monitor the maintenance of the Single Central Record for both learners and staff.

The full responsibilities of the DSL and Deputy DSL are set out in their job description and Annex C of Keeping Children Safe in Education

There is a wider safeguarding team with additional Safeguarding Officers, listed at appendix 7.

## **I. Governance**

The Governing Body will:

Facilitate a whole-group approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development. Helping to create a culture of safeguarding

Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the CEO to account for its implementation

Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our local multi-agency safeguarding arrangements

Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board.

Make sure that the DSL fulfils their requirements as per their job description, detailed in KCSIE 2023 and within this policy. This also includes online safety and understanding the filtering and monitoring systems and processes in place.

## **J. The Chief Executive Officer (CEO)**

The CEO is responsible for the implementation of this policy, including:

Ensuring that staff (including temporary staff) and volunteers:

Are informed of our systems which support safeguarding, including this policy, as part of their induction

Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

Ensuring that the DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent

Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly

Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.

Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.

## **K. Partners and Members**

All partners, members and subcontractors should have their own policies and procedures in place to reflect all legislation included in this policy and follow Keeping Children Safe in Education 2023. This should be in context with the partners or members local safeguarding

organisations and requirements.

All concerns related to Mantra Group learners should be notified as per this policy to the Mantra Group Safeguarding Team.

All partners, members and subcontractors will undergo due diligence checks as per the Quality Assurance Manual to ensure that their safeguarding arrangements are effective and provide intervention when a potential risk is identified.

## **L. Confidentiality**

Confidentiality is an issue that needs to be understood by all those working with learners particularly in the context of safeguarding. Timely information sharing is essential to effective safeguarding. The Mantra Group recognises that the only purpose of confidentiality in this respect is to benefit the learner. Staff, volunteers, and visitors to the group must never promise a learner that they will not tell anyone about a disclosure or allegation as this may not be in the learner's best interest. They must report any cause for concern to the DSL or Deputy DSL immediately.

Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children and learners. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.

Staff should never promise a learner that they will not tell anyone about a report of abuse, as this may not be in the learner's best interests. If a victim asks the school not to tell anyone about the sexual violence or sexual harassment, the DSL will have to balance the victim's wishes against their duty to protect the victim and other learners.

All staff should only share concerns with a member of the safeguarding team and/or appropriate external service. Staff should not discuss concerns with colleagues or others.

## **M. Recognising abuse and taking action**

Staff, volunteers, and governors must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

8.1 If a learner is suffering or likely to suffer harm or in immediate danger:

Staff must report their safeguarding concerns immediately to the DSL using our internal recording system, or in person. The DSL will make a referral to children's social care and/or the police immediately if they believe a learner is suffering or likely to suffer from harm or is in immediate danger.

Anyone can make a referral directly to Rochdale Safeguarding Partnership and/or the police however they must tell the DSL as soon as possible. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

If a learner makes a disclosure to you:



- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the learner they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Record your conversation as soon as possible in the learner's own words on the safeguarding referral form. Stick to the facts, and do not put your own judgement on it.
- Not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

Bear in mind that some learners may:

- Not feel ready, or know how to tell someone that they are being abused, exploited, or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a learner.

### **Early help assessment and On boarding**

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

During on boarding, learners will be asked specific questions related to safeguarding to ascertain what monitoring and intervention needs to be put into place. In addition, if a risk assessment is required.

### **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible.

If you have concerns about extremism:

If a learner is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Effective early support relies on all staff to be vigilant. Mantra Learning will ensure that all front-line staff undertake Prevent awareness training.

If you have a mental health concern:

Staff are aware that mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.

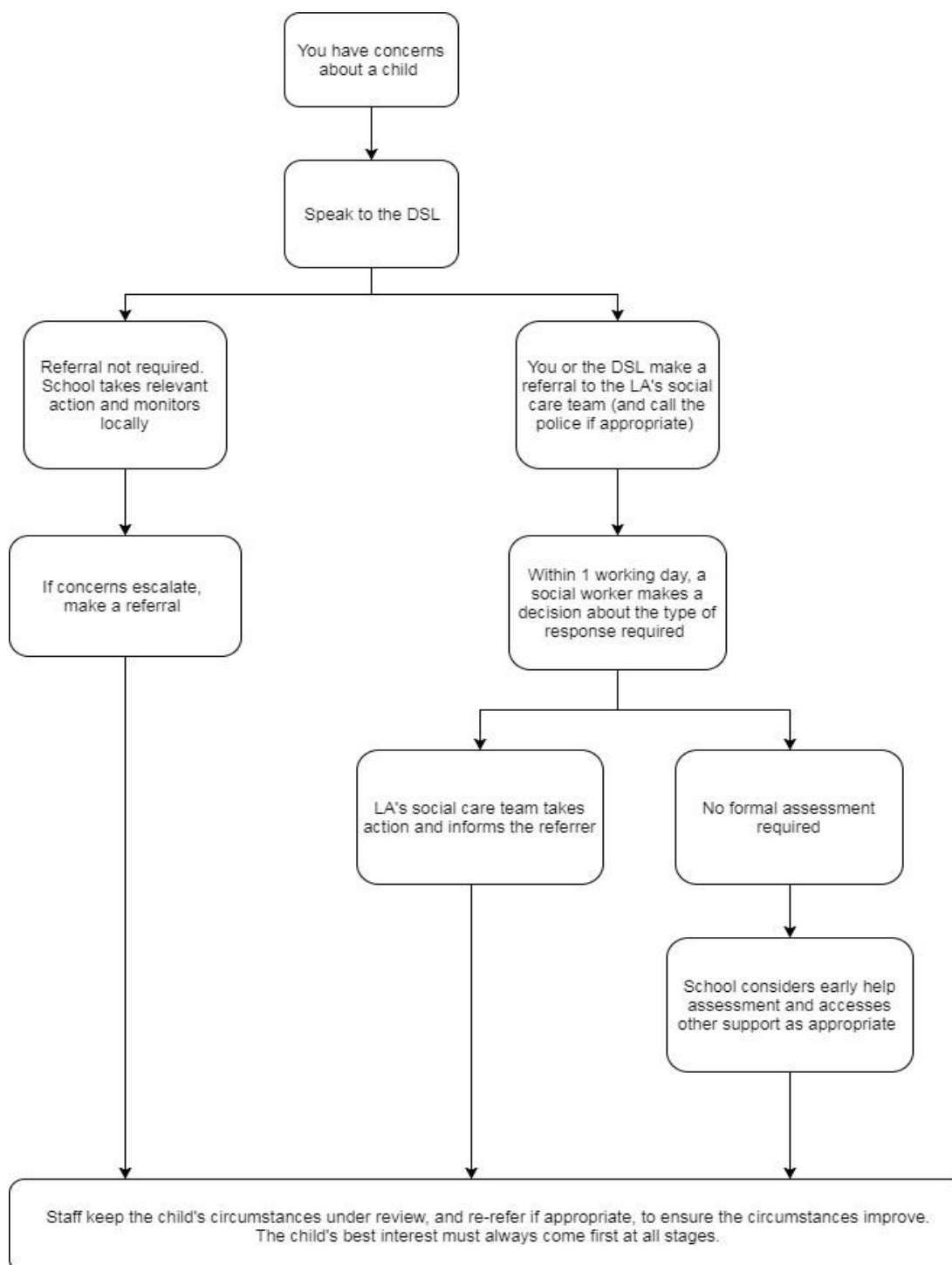
Staff understand that:

- Abuse and neglect, or other potentially traumatic adverse childhood experiences can have a lasting impact throughout childhood, adolescence and into adulthood.
- Staff are aware of how these experiences can impact on children's mental health, behaviour, and education.
- They have a duty to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a learner that is also a safeguarding concern, they will report this using our internal recording system or speak directly to the DSL.

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



### Concerns about a staff member, tutor, volunteer, or contractor

If you have concerns about a member of staff (including a cover tutor, volunteer, or contractor), or an allegation is made about a member of staff (including a supply tutor,

volunteer, or contractor) posing a risk of harm to children, speak to the CEO as soon as possible. If the concerns/allegations are about the CEO, speak to the chair of governors.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply tutor, volunteer, or contractor) to the CEO, report it directly to the local authority designated officer (LADO).

Allegations of abuse made against other learners:

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for learners.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of learners hurting other learners will be dealt with under our learner behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put learners at risk
- Is violent
- Involves learners being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

### **Procedures for dealing with allegations of child-on-child abuse**

If a learner makes an allegation of abuse against another learner:

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

### **Creating a supportive environment in learning and minimising the risk of child-on-child abuse**

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female learners, and initiation or hazing type violence with respect to boys

- Ensure our curriculum helps to educate learners about appropriate behaviour and consent
- Ensure learners can easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes, and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support learners who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment

Sharing of nudes and semi-nudes (sexting)

### **Your responsibilities when responding to an incident (sexual imagery)**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a learner to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the learner to delete it
- Ask the learner(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the learner(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident and reassure the learner(s) that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns.

If none of the above apply then the DSL, in consultation with the CEO and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

## **Curriculum coverage**

Learners are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships, Sex and Health Education. Teaching covers the following in relation to the sharing of nudes and semi-nudes.

Reporting systems for our learners:

Where there is a safeguarding concern, we will take the learner's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring learners feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for learners to confidently report abuse (through the Pastoral and Safeguarding Team structure)
- Ensure our reporting systems are well promoted, easily understood and easily accessible for learners (TV screens, noticeboards and handbooks).
- Make it clear to learners that their concerns will be taken seriously, and that they can safely express their views and give feedback. Staff will reassure learners that they have done the right thing in reporting their concerns and explain the next steps whilst also reminding learners that they will have to pass this information on to the safeguarding team who will coordinate an appropriate response and support for them.

## **N. Onsite and Online safety and use of mobile technology**

### **Onsite**

The facilities team onsite have been given specific training to support in the high risk areas of the onsite facilities, specifically, HGV areas, warehouses, automotive workshop and electric vehicle workshop. This also includes personal protective equipment (PPE).

Specific training has been given to ensure that random and planned drugs and alcohol tests can be administered to support our zero tolerance approach. The learner behaviour policy details this in more detail, signposting will always be shared with learners or apprentices that are having difficulties or have a drug or alcohol problem.

### **External Partners, Subcontractors and Members**

This policy is shared with all external stakeholders and common literature and training is shared with these stakeholders to ensure that we have a standardized approach to safeguarding. There is a named Point of Contact (PoC) for each stakeholder in safeguarding and these PoCs are invited and engage with the regular safeguarding interventions. It is also recognised that some stakeholders have their own safeguarding policy and this is shared during due diligence checks and common practices adopted.

Regional and local safeguarding risks will vary and these risks are shared with learners and apprentices to help better safeguard them.

## Online

We recognise the importance of safeguarding children and vulnerable adults from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, Mantra Learning aims to:

- Have robust processes in place to ensure the online safety of learners, staff, volunteers, and governors
- Protect and educate the whole of the Mantra Group in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the Mantra Group
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Ensure appropriate filtering and monitoring on IT networks

### The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

**Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, and extremism

**Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial, or other purposes

**Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

### To meet our aims and address the risks above we will:

Educate learners about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring learners are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during community engagement events. We will also share clear

procedures with them, so they know how to raise concerns about online safety

- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff are allowed to bring their personal phones to work for their own use, but will limit such use to non-contact time when learners are not present
- Staff will not take pictures or recordings of learners on their personal phones or cameras
- Make all learners, parents/carers, staff, volunteers, and governors aware of the Acceptable User Policy regarding the acceptable use of the internet, use of the ICT systems and use of their mobile.
- Explain the sanctions we will use if a learner is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, learners and parents/carers are aware that staff have the power to search learners' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by Mantra Group.

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

We have included our group codes of conduct in the annexes that will be displayed for learners on site and virtually during learning.

## **Filtering and Monitoring**

Whilst considering our responsibility to safeguard and promote the welfare of children and learners to provide them with a safe environment to learn, our governance team, relevant staff and all staff will do all that is reasonable to limit children and learner's exposure to the risks detailed above from the Mantra Group IT system.

We ensure that we have appropriate filtering and monitoring systems in place and regularly review their effectiveness. We ensure that the Senior Management Team and staff have an awareness and understanding of the provisions in place to manage them effectively and know how to escalate concerns identified. Regular reviews of those at greater risk of harm and The Prevent Duty risk assessment will support this process.

An introduction has been made for:

- New roles assigned to manage filtering and monitoring systems
- Annual review of the filtering and monitoring process
- Blocking of harmful and inappropriate without impacting on teaching and learning
- Effective monitoring strategies in place that meet safeguarding needs.
- Further support can be found at:



UK Safer Internet Centre: <https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring>. The UK Safer Internet Centre produced a series of webinars for teachers on behalf of the Department.

The Mantra Group are directly responsible for ensuring an appropriate level of security protection procedures in place in order to safeguard systems, staff and learners and will review the effectiveness periodically to keep up with cyber-crime technologies.

## **O. Learners with Special Educational Needs, disabilities or health issues**

We recognise that learners with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's condition without further exploration
- Learners being more prone to peer group isolation or bullying (including prejudice-based bullying) than other learners
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

## **P. Learners with a social worker**

Learners may need a social worker due to safeguarding or welfare needs. We recognise that a learner's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour, and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable learners. Where we are aware that a learner has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the learner's safety, welfare, and educational outcomes.

## **Q. Looked after and previously looked after children**

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements

**It is understood that learners that are absent from education for prolonged**

**periods of time can signal a vital warning sign to a range of safeguarding issues and that this will be taken into account and monitored in conjunction with the group attendance policy, any learners this may apply to will be flagged to the safeguarding team.**

## **R. Complaints and concerns about safeguarding procedures at Mantra Learning**

### **Complaints against staff**

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff.

### **Other complaints**

The Complaints Policy is available on the website.

### **Whistleblowing**

All staff can raise concerns about poor or unsafe practice and potential failures in the safeguarding regime. Our whistleblowing procedures are reflected in our Staff Code of Conduct.

The Whistleblowing Policy is available on the staff shared drive under Non-Statutory Policies.

If staff feel unable to raise concerns with the CEO they can contact the Local Authority Designated Officer (LADO) or call the NSPCC whistleblowing helpline 0800 028 0285.

## **S. Record Keeping**

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome, changes and interventions that have been put in place as a result of the concern or near miss

## **T. Training**

All staff:

The welfare of our staff is of paramount importance.

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the safeguarding systems and their responsibilities, and can identify signs

of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned, and considered as part of the whole-group safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the ETF professional standards
- Manage behaviour effectively to ensure a good and safe environment
- Have a clear understanding of the needs of all learners

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children and vulnerable adults at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through e-learning modules, e-mails, e-bulletins, staff meetings and staff briefing presentations). Many elements of training are routinely followed up by assessments to check for understanding and identify further training needs. Others involve the staff member signing a declaration to confirm their awareness and understanding of the training element being reviewed.

Contractors and any volunteers working with Mantra will also receive safeguarding training.

### **The DSL and Deputy**

The DSL and deputy will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

Governors:

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the Mantra Group to deliver a robust approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the CEO, they receive training in managing allegations for this purpose.

### **Recruitment (interview panels)**

At least 1 person conducting any interview for any post at Mantra will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children

Safe in Education, and will be in line with local safeguarding procedures.

### **Staff who have contact with learners and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

### **U. Monitoring arrangements**

This policy will be reviewed **annually** by Kay Hadfield, DSL (Mantra), General Manager. Paul Wilde, DSL (Academy). At every review, it will be approved by the full governing board and Chief Executive Officer.

### **These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education**

### **V. Appendix 1 – Types of abuse**

**Abuse** including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- . Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- . Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- . Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- . Seeing or hearing the ill-treatment of another
- . Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- . Physical contact, including assault by penetration (for example, rape or oral sex) or

non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing

- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, 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.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

## **W. Appendix 2: Safer recruitment and DBS checks – policy and procedures – Staff and Learner recruitment / onboarding**

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

### **Advertising**

When advertising roles, we will make clear:

- Our commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken and online searches of candidates carried out
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

### **Application forms**

Our application forms will:

Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)

### **Shortlisting**

Our shortlisting process will involve at least 2 people, one of whom is trained in safer recruitment practice and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

## **Seeking references and checking employment history**

We will endeavour to obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- . Not accept open references
- . Liaise directly with referees and verify any information contained within references with the referees

Ensure any references are from the candidate's current employer and completed by a senior person.

- . Obtain verification of the candidate's most recent relevant period of employment if they are not currently Employed  
Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children  
Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate  
Resolve any concerns before any appointment is confirmed

## **Interview and selection**

When interviewing candidates, we will:

- . Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- . Explore any potential areas of concern to determine the candidate's suitability to work with children
- . Record all information considered and decisions made

## **Pre-appointment vetting checks**

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- . Verify their identity
- . Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- . Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- . Verify their mental and physical fitness to carry out their work responsibilities

- . Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- . Verify their professional qualifications, as appropriate
- . Ensure they are not subject to a prohibition order if they are employed to be a teacher
- . Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  - o For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - o For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

**Regulated activity** means a person who will be:

- . Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; Or

- . Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- . There are concerns about an existing member of staff's suitability to work with children; or
- . An individual moves from a post that is not regulated activity to one that is; or
- . There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- . We believe the individual has engaged in [relevant conduct](#); or
- . We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- . We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- . The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.



## **Contractors**

If a contractor has no DBS, they must be escorted at all times.

Where possible we will ensure that any contractor, or any employee of the contractor, who is to work at Mantra has had the appropriate level of DBS check. This will be:

- . An enhanced DBS check with barred list information for contractors engaging in regulated activity
- . An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at Mantra Learning.

## **Trainee tutors**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

## **Volunteers**

We follow all Safer Recruitment processes for volunteers as we would with any other employee. We will:

Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

- . Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- . Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

## **Governors**

All governors will have a DBS check.

All governors will also have the following checks:

- . Identity
- . Right to work in the UK
- . Other checks deemed necessary if they have lived or worked outside the UK

## **Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation

from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

## **Recruiting and onboarding learners**

If a learner discloses any unspent criminal convictions, a member of the safeguarding team or relevant department must be apprised of the matter using the procedure described in section 5.0. In some instances, the learning programme or starting the learning programme will be put on hold until a further investigation can be undertaken.

The final decision on suitability for programme will be made by the safeguarding team, with support accessed from any relevant individuals such as probation and/or the police.

Each assessment for suitability for the programme will be conducted and assessed on an individual basis. Dependant on an individual's risk and/or restrictions, the following outcomes may be (but not limited to):

- **Not suitable for programme-** Individuals who have restrictions in relation to children (under 18's) and/or vulnerable adults, require a high level of supervision and/or deemed a high risk to or against others.
- **Suitable for programme, but with monitoring and/or programme adjustments to online learning only-** Individuals who are deemed a medium risk to others
- **Suitable for programme-** Individuals who have spent convictions and/or deemed a low risk to others and/or have no restrictions and/or no restrictions which affect them to attend the learning programme.

As well as the above, Mantra Learning will not be able to accept individuals onto programme where managing any risks identified require additional changes to facilities and/or programmes and/or require specialist trained staff members.

## **X. Appendix 3: Allegations of abuse made against staff**

Section 1 – allegations that might meet the harms threshold

*This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.*

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer, or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of Mantra Learning

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

### **Suspension of the accused until the case is resolved**

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

### **Definitions for outcomes of allegation investigations (as defined in paragraph 400 of Keeping Children Safe in Education 2023)**

**Substantiated:** there is sufficient evidence to prove the allegation

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

**False:** there is sufficient evidence to disprove the allegation

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of

action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care

### **Additional considerations for supply tutors and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by Mantra, such as a supply tutor or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another setting, while the investigation is carried out
- We will involve the agency fully, but Mantra will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are considered (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week

- . If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- . If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

#### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or Mantra ceases to use their services, or the individual resigns or otherwise ceases to provide their services, Mantra will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, Mantra will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

#### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation if they are still attending Mantra.

#### **Unsubstantiated, unfounded, false, or malicious reports**

If a report is:

- . Determined to be unsubstantiated, unfounded, false, or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- . Shown to be deliberately invented, or malicious, Mantra will consider whether any disciplinary action is appropriate against the individual(s) who made it

#### **Unsubstantiated, unfounded, false, or malicious allegations**

If an allegation is:

- . Determined to be unsubstantiated, unfounded, false, or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, Mantra will consider whether any disciplinary action is appropriate against the individual(s) who made it

## **Confidentiality and information sharing**

Mantra will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police, and children's social care services, as appropriate, to agree:

- . Who needs to know about the allegation and what information can be shared
- . How to manage speculation, leaks, and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- . What, if any, information can be reasonably given to the wider community to reduce speculation
- . How to manage press interest if, and when, it arises

## **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- . A clear and comprehensive summary of the allegation
- . Details of how the allegation was followed up and resolved
- . Notes of any action taken, decisions reached and the outcome
- . A declaration on whether the information will be referred to in any future reference

In these cases, Mantra will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

## **References**

When providing employer references, we will:

- . Not refer to any allegation that has been found to be false, unfounded, unsubstantiated, or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated, or malicious
- . Include substantiated allegations, provided that the information is factual and does not include opinions

## **Learning lessons**

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to Mantra's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- . Issues arising from the decision to suspend the member of staff
- . The duration of the suspension
- . Whether or not the suspension was justified
- . The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

## **Non-recent allegations**

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to Mantra that they were abused as a child, we will advise the individual to report the allegation to the police.

## **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- . Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- . Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- . Being overly friendly with children
- . Having favourites
- . Taking photographs of children on their mobile phone
- . Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- . Humiliating learners

## **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- . Ensuring staff are clear about what appropriate behaviour is, and are confident in

distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in Mantra's safeguarding system

### **Responding to low-level concerns**

If the concern is raised via a third party, the CEO will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The CEO will use the information collected to categorise the type of behaviour and determine any further action, in line with the Staff Code of Conduct. The CEO will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

### **Record Keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely, and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply tutor or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance



## **Y. Appendix 4: Specific Safeguarding issues**

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular annex B.

Annex B also includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery, and cybercrime. If you wish to cover these in the policy, consider including:

### **Children missing from education**

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- . Are at risk of harm or neglect
- . Are at risk of forced marriage or FGM
- . Come from Gypsy, Roma, or Traveller families
- . Come from the families of service personnel
- . Go missing or run away from home or care
- . Are supervised by the youth justice system
- . Cease to attend a learning
- . Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves Mantra without a new setting being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

### **Child Criminal Exploitation**

Child Criminal Exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- . Appearing with unexplained gifts or new possessions
- . Associating with other young people involved in exploitation
- . Suffering from changes in emotional wellbeing
- . Misusing drugs and alcohol
- . Going missing for periods of time or regularly coming home late
- . Regularly missing education
- . Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

### **Child Sexual Exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- . Having an older boyfriend or girlfriend
- . Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

## **Child-on-child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the two.

Mantra Learning has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')

Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm

- (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

## **Domestic abuse**

Learners can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a learner may blame themselves

for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological, or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on learners.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children and adults may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development, and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult (usually the designated safeguarding lead) before the child or children arrive at Mantra the following day (a system known as Operation Encompass).

The DSL will provide support according to the child's needs and update records about their circumstances.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's and adult's welfare.

The DSL and deputy will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **FGM (Female Genital Mutilation)**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children and adults affected by FGM or at risk of FGM.

Indicators that FGM has already occurred include:

- A learner confiding in a professional that FGM has taken place

- A mother/family member disclosing that FGM has been carried out
- A family/learner already being known to social services in relation to other safeguarding issues

## **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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 or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the learner about their concerns in a secure and private place. They will then report this to the DSL.

In addition, since Feb 23, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used.

## **Preventing radicalisation**

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

We have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children and learners at Mantra being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place and equip our learners to stay safe online at Mantra and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in learner behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a learner is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities, they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Learners who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

Staff should **always** take action if they are worried.

## **Sexual violence and sexual harassment between children and adults**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)
- Between adults and children

Sexual violence and sexual harassment exist on a continuum and may overlap.

Learners who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same setting.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- . Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- . Regularly review decisions and actions, and update policies with lessons learnt
- . Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- . Consider if there are wider cultural issues within Mantra that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- . Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual, and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- . Challenging inappropriate behaviours
- . Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- . Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

## **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- . Increased absence
- . Change in friendships or relationships with older individuals or groups
- . Significant decline in performance
- . Signs of self-harm or a significant change in wellbeing
- . Signs of assault or unexplained injuries
- . Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- . Being male
- . Having been frequently absent or permanently excluded
- . Having experienced child maltreatment and/or abuse
- . Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a learner being involved in, or at risk of, serious violence, they will report this to the DSL.

## **Checking the identity and suitability of visitors**

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to



produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge and high vis shirt. Please refer to Mantra Group Visitor and Contractor Premise Access Policy.

## **Z. Appendix 5 – Local area safeguarding contacts**

### **Safeguarding in Bury**

- MASH Team 0161 253 5678 / Safeguarding Unit 0161 253 6168
- Bury Social Services out of hours 0161 253 6606
- E-mail – [childwellbeing@bury.gov.uk](mailto:childwellbeing@bury.gov.uk)
- Adults Care Services customer contact centre: 0161 253 5151 normal office hours
- Emergency Social service team: 0161 253 6606 at all other times
- LADO – Mark Gay 0161 253 5342 [M.Gay@bury.gov.uk](mailto:M.Gay@bury.gov.uk)
- PREVENT – Tom Hoghton 0161 253 5099 [T.L.Hoghton@bury.gov.uk](mailto:T.L.Hoghton@bury.gov.uk)
- Police Case Management Team – 0161 856 8060 [Bury.CMT@GMP.police.uk](mailto:Bury.CMT@GMP.police.uk)

### **Safeguarding Rochdale (Heywood and Middleton)**

- Children's Social Care Services : 0300 303 0440 / Safeguarding Unit 0300 303 0350
- Out of Hours - 0300 303 8875
- E-mail: [Ehash@rochdale.gov.uk](mailto:Ehash@rochdale.gov.uk)
- Adults Care Services Team : 0300 303 8886
- Out of Hours - 0300 303 8875
- LADO – Louise Hurst 0300 3030 350 [lado@rochdale.gov.uk](mailto:lado@rochdale.gov.uk)
- PREVENT – Sijad Miah [Sijad.Miah@Rochdale.gov.uk](mailto:Sijad.Miah@Rochdale.gov.uk)
- Police Case Management Team – 0161 856 8757  
[Rochdale.CMT@GMP.Police.uk](mailto:Rochdale.CMT@GMP.Police.uk)

### **Safeguarding in Oldham**

- MASH Team 0161 770 7777 / Safeguarding Unit 0161 770 8080
- Emergency Team 0161 770 6936
- E-mail - [Adult.mash@oldham.gov.uk](mailto:Adult.mash@oldham.gov.uk)
- E-mail - [Child.mash@oldham.gov.uk](mailto:Child.mash@oldham.gov.uk)
- LADO – Colette Morris – 0161 770 8870 [colette.morris@oldham.gov.uk](mailto:colette.morris@oldham.gov.uk)
- PREVENT – Bruce Penhale [bruce.penhale@oldham.gov.uk](mailto:bruce.penhale@oldham.gov.uk)
- Police Case Management Team – 0161 856 9048  
[Oldham.CMT@GMP.Police.uk](mailto:Oldham.CMT@GMP.Police.uk)

### **Safeguarding in Manchester**

- MASH Team - 0161 234 5001 / Safeguarding Unit 0161 234 1214
- E-mail [mcsreply@manchester.gov.uk](mailto:mcsreply@manchester.gov.uk)
- LADO – Majella O'Hagan – 0161 234 1214  
[quality.assurance@manchester.gov.uk](mailto:quality.assurance@manchester.gov.uk)
- PREVENT – Samiya Butt [S.Butt@manchester.gov.uk](mailto:S.Butt@manchester.gov.uk)
- Police Case Management Team – North – 0161 856 3097  
[COMNorth.CMT@GMP.Police.uk](mailto:COMNorth.CMT@GMP.Police.uk) / South – 0161 856 4856



[COMSouth.CMT@GMP.Police.uk](mailto:COMSouth.CMT@GMP.Police.uk) / Central – 0161 856 4444  
[COMCentral.CMT@GMP.Police.uk](mailto:COMCentral.CMT@GMP.Police.uk)

### **Safeguarding in Stockport**

- MASH Team number 0161 217 6028
- Emergency Out of Hours – 0161 718 2118
- E-mail [massh@stockport.gov.uk](mailto:massh@stockport.gov.uk)
- LADO – Gill Moore – 0161 474 5657/07866 999 683  
[Gill.Moore@stockport.gov.uk](mailto:Gill.Moore@stockport.gov.uk)
- PREVENT – Rachel Smith [Rachel.Smith@Stockport.gov.uk](mailto:Rachel.Smith@Stockport.gov.uk)
- Police Case Management Team – 0161 856 3187  
[Stockport.CMT@GMP.Police.uk](mailto:Stockport.CMT@GMP.Police.uk)

### **Safeguarding in Salford**

- MASH Team 0161 603 4500 / Safeguarding Unit 0161 603 4350
- Emergency Out of Hours – 0161 794 8888
- E-mail [worriedaboutachild@salford.gov.uk](mailto:worriedaboutachild@salford.gov.uk)
- Website - <https://www.salford.gov.uk/children-and-families/safeguarding-children/worried-about-a-child/>
- LADO – Steve Westhead / Liz Peppiatt 0161 603 4350  
[stephen.westhead@salford.gov.uk](mailto:stephen.westhead@salford.gov.uk) / [Elizabeth.peppiatt@salford.gov.uk](mailto:Elizabeth.peppiatt@salford.gov.uk)
- PREVENT – Jo Rutter 0161 778 0315 [Josephine.Rutter@salford.gov.uk](mailto:Josephine.Rutter@salford.gov.uk)
- Police Case Management Team – 0161 856 4479  
[Salford.CMT@GMP.Police.uk](mailto:Salford.CMT@GMP.Police.uk)

### **Safeguarding in Tameside**

- MASH Team 0161 342 4101 / Safeguarding Unit 0161 342 4343
- Emergency Out of Hours – 0161 342 2222
- E-mail – [Emma.Lewis@tameside.gov.uk](mailto:Emma.Lewis@tameside.gov.uk) (not for referrals!)
- Website - <https://www.tameside.gov.uk/childabuse>
- LADO – Tania Brown 0161 342 4398 [tania.brown@tameside.gov.uk](mailto:tania.brown@tameside.gov.uk)
- PREVENT – Emma Varnam [Emma.Varnam@tameside.gov.uk](mailto:Emma.Varnam@tameside.gov.uk)
- Police Case Management Team – 0161 856 9228  
[Tameside.CMT@GMP.Police.uk](mailto:Tameside.CMT@GMP.Police.uk)

### **Safeguarding in Trafford**

- MASH Team 0161 912 5125
- Emergency Out of Hours – 0161 912 2020
- E-mail [Marat@trafford.gov.uk](mailto:Marat@trafford.gov.uk)
- Concerns about Adults – E-mail [AdultSafeguardinghub@trafford.gov.uk](mailto:AdultSafeguardinghub@trafford.gov.uk)
- Website - <https://www.trafford.gov.uk/residents/children-and-families/worried-about-a-child/trafford-first-response.aspx>
- LADO – Anita Hopkins 0161 912 5024 [anita.hopkins@trafford.gov.uk](mailto:anita.hopkins@trafford.gov.uk)
- PREVENT – Kerry Purnell 0161 912 2115 [Kerry.Purnell@trafford.gov.uk](mailto:Kerry.Purnell@trafford.gov.uk)
- Police Case Management Team – 0161 856 7574  
[Trafford.CMT@GMP.Police.uk](mailto:Trafford.CMT@GMP.Police.uk)

## Safeguarding in Wigan

- MASH Team 01942 828 300 / Safeguarding Unit 01942 705 942
- Emergency Out of Hours – 0161 834 2436
- Concerns for Adults - <https://www.wigan.gov.uk/Contacts/Adult-social-care.aspx>
- LADO – Diane Kitcher 01942 486 034 [lado@wigan.gov.uk](mailto:lado@wigan.gov.uk)
- PREVENT –Amanda Crane 0161 856 6362 [A.Crane@wigan.gov.uk](mailto:A.Crane@wigan.gov.uk)
- Police Case Management Team – 0161 856 7955  
Wigan.CMT@GMP.Police.uk

## Safeguarding in Bolton

- Safeguarding Unit 01204 337 479
- Reporting for Children 01204 331 500
- Emergency Out of Hours 01204 337 777
- Reporting for Adults 01204 337 000
- E-mail [CPU@bolton.gov.uk](mailto:CPU@bolton.gov.uk)
- LADO – Paula Williams 01204 337 474  
[boltonsafeguardingchildren@bolton.gov.uk](mailto:boltonsafeguardingchildren@bolton.gov.uk)
- PREVENT – Vivienne Morris [Vivienne.Morris@bolton.gov.uk](mailto:Vivienne.Morris@bolton.gov.uk)
- Police Case Management Team – 0161 856 5588 [Bolton.CMT@gmp.police.uk](mailto:Bolton.CMT@gmp.police.uk)
  
- **Greater Manchester Police Safeguarding Vulnerable Persons Unit:**
  - 0161 856 6411 / 0161 856 5017 / 0161 856 7484
  - [Publicprotection.division@gmp.pnn.police.uk](mailto:Publicprotection.division@gmp.pnn.police.uk)
- **Greater Manchester Police Modern Slavery Unit:**
  - [traffickingandslavery@gmp.police.uk](mailto:traffickingandslavery@gmp.police.uk)
  
- **Rochdale Borough Safeguarding Children Partnership**
  - Tel: **01706 927700**
  - E-mail: [rbsb.admin@rochdale.gov.uk](mailto:rbsb.admin@rochdale.gov.uk)
  - Website: [www.rochdalesafeguarding.com](http://www.rochdalesafeguarding.com)
  
- **Salford Safeguarding Children Partnership**
  - Tel: **0161-603 4350**
  - E-mail: [sscp@salford.gov.uk](mailto:sscp@salford.gov.uk)
  - Website: [safeguardingchildren.salford.gov.uk/](http://safeguardingchildren.salford.gov.uk/)
  
- **Stockport Safeguarding Children Partnership**
  - Telephone: **0161 474 5657**
  - Email: [lsb@stockport.gov.uk](mailto:lsb@stockport.gov.uk)
  - Website: [www.safeguardingchildreninstockport.org.u  
k/](http://www.safeguardingchildreninstockport.org.uk/)

## Safeguarding in St Helens

- MASH Team 01744 676767

- Website: <https://www.sthelens.gov.uk/social-care-health/adults/safeguarding-adults/safeguarding-adults-professionals/safeguarding-adults-board/>

### **Safeguarding in Liverpool**

- MASH Team 0151 233 3700
- Website - <https://liverpool.gov.uk/children-and-families/childrens-social-care/keeping-children-safe/children-at-risk/>

### **Safeguarding in Warrington**

- MASH Team 01925 443322
- Website: [http://www.proceduresonline.com/pancheshire/warrington/p\\_report\\_concerns.html](http://www.proceduresonline.com/pancheshire/warrington/p_report_concerns.html)

### **Safeguarding in Cheshire**

- MASH Team 0300 123 7047
- Adults Team 0300 123 7034
- Emergency Out of Hours 01244 977 277
- E-mail [accesswest@cheshirewestandchester.gov.uk](mailto:accesswest@cheshirewestandchester.gov.uk)

## **Appendix 6 – Regional area internal and external safeguarding contacts**

A full list of regional Safeguarding contacts is available via Microsoft Teams:

<https://mantralearning.sharepoint.com/:x:/r/sites/Safeguarding/Shared%20Documents/General/External%20Referral%20Information/SAFEGUARDING%20-%20National%20Referral%20Info.xlsx?d=w10bc14e15078420cb1fc1ef0b52a9380&csf=1&web=1&e=xPpo6k>



**APPENDIX 6- SAFEGUARDING REFERRAL FORM  
SAFEGUARDING LEARNERS, CHILDREN, YOUNG PEOPLE AND VULNERABLE ADULTS**

**\*NOTE: PLEASE DO NOT INCLUDE THE FULL NAMES OF ANY INDIVIDUALS OTHER THAN YOURSELF ON THIS FORM. NAMES WILL BE COLLECTED SEPARATELY AND RECORDED SECURELY**

PLEASE EMAIL COMPLETED FORM TO [SAFE@MANTRALEARNING.CO.UK](mailto:SAFE@MANTRALEARNING.CO.UK) or [SAFE@LOGISTICSACADEMY.CO.UK](mailto:SAFE@LOGISTICSACADEMY.CO.UK)

Concern in relation to and their age* (learner/staff member etc.):		Programme learner currently undertaking (if applicable):	
Your Name and Job role:		Your contact details:	

A brief description of the incident/ongoing issue/concern:	
Details of any steps taken so far to manage the incident/address the issue:	
Details of anyone externally involved in supporting the learner (social worker, mental health professional, probation officer etc):	

--	--

***Safeguarding team ONLY***

<i>Received by:</i>		<i>Date Received:</i>		<i>Concern Number:</i>	
<i>Safeguarding officer assigned:</i>					
<b><i>Details of intervention taken</i></b>					
<b><i>Concern Closure Details</i></b>					