Safeguarding Policy (Apprenticeships)

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1. Context

Manor Green Apprenticeships is a part of Manor Green School. We are committed to safeguarding and promoting the welfare of our apprentices and aim to ensure we provide help and support to meet their needs as soon as problems emerge. As such, all staff and trainers involved in the delivery of apprenticeships have a duty to read and follow the School's separate Safeguarding, Whistleblowing policy and Grievance

Procedure. Similarly, apprentices in other settings should read this policy in conjunction with their own employers' policies and procedures.

This policy deals with aspects of safeguarding that are specific to any apprentice who is 16 and 17 or deemed an adult at risk by an appropriate professional (see appendix 1).

We recognise that safeguarding is the responsibility of the organisation, trainers and apprentices: our staff take all welfare concerns seriously and encourage our apprentices to communicate to us about anything that may worry them. We expect our visitors to share the same stance.

Safeguarding and promoting the welfare of children is best defined as 'protecting children from maltreatment (both inside and outside the home, including online), preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes'.

Safeguarding and promoting the welfare of adult at risk is best defined as preventing and reducing 'the risk of significant harm to adult at risk from abuse or other types of exploitation (both inside and outside the home, including online), whilst supporting individuals in maintaining control over their lives and in making informed choices without coercion'.

2. Aims and scope

The policy aims to:

a) safeguard apprentices in relation to physical abuse, emotional abuse, sexual abuse, neglect and exploitation (Appendix 1);

b) meet contextual safeguarding responsibilities (Appendix 2);

c) address any further causes of safeguarding (Appendix 2)

d) work in conjunction with the MGA Prevent Policy, which safeguards apprentices from the risks of radicalisation.

Information about the signs of abuse, specific safeguarding issues, and further causes of safeguarding, as detailed in the Appendices, will be incorporated into briefings and on-going training for staff, volunteers and governors.

The scope of the policy is to

- have in place procedures to ensure MGA meets its responsibilities for safeguarding and promoting the welfare of all apprentices who are either under the age of 18 (referred to hereafter as 'children') or adult at risk.
- ensure that all staff are able to identify safeguarding concerns and are aware of what action to take, including making relevant referrals to Family Help Services or Safeguarding Services, as soon as any problem emerges.

- create and provide a learning environment that is safe, secure, warm and welcoming for learners, combined with sound security systems and procedures.
- establish and maintain an ethos where any apprentice who is a child or adult at risk and their parent/carers feel secure in being able to talk confidently to personnel about any concerns or fears they may have knowing that they will be taken seriously.
- establish and maintain procedures for safer recruitment and to establish and maintain sound working relationships with parents, carers and external agencies.
- ensure compliance with all relevant legislation connected to this policy.

3. Legal and advisory framework

Manor Green Apprenticeships takes account of the information contained in the following:

- Working Together to Safeguard Children (June 2025), Working together to safeguard children - GOV.UK (www.gov.uk)
- Keeping Children Safe in Education: Statutory Guidance for Schools and Colleges (Sep 2026), Keeping children safe in education 2026
- RBWM Safeguarding Partnership: information on safeguarding adults
- RBWM Safeguarding Partnership: information on safeguarding children
- Office of the Public Guardian safeguarding policy (updated Jan 2023)
- Care Act 2014

Links to other documents

- MGA Prevent Policy
- MGA Complaints Policy
- MGS Safeguarding Policy, Whistleblowing Policy and Grievance Procedure

4. Roles and responsibilities

4.a The Governing Board

The Governing Board is responsible for ensuring that the statutory guidance and legislation is followed. Manor Green School has a link governor who visits the school regularly to liaise with the Designated Safeguarding Lead (DSL) and to report back to the Governing Board.

The Governing Board must ensure the school meets the following key requirements:

- that the Safeguarding policy, procedures and training are effective and comply with the law;
- all governors and trustees receive appropriate safeguarding and child protection (including online safety) training at induction, and that this training is updated regularly;
- the school contributes to inter-agency work, meeting statutory requirements;
- the school takes into account the procedures and practice of Multi Agency Safeguarding Partners for RBWM;
- there is a nominated governor to deal with any allegations of abuse made against the Headteacher;
- there is a staff code of conduct which includes staff use of social media;
- that a senior member of staff is appointed by the Governing Board to act as the Designated Safeguarding Lead;
- consideration is given to how safeguarding as part of personal wellbeing is covered with apprentices at each quarterly review;
- safer recruitment procedures, including appropriate use of reference checks on new staff and volunteers, are in place;
- there are procedures to deal with allegations of abuse against members of staff and volunteers;
- that any action taken is always in the best interest of the apprentice and takes account of their wishes and feelings;
- that a Designated Teacher in charge of Children In Care is appointed;
- there are procedures are in place to report children missing from education, Children missing education: statutory guidance for local authorities and schools - GOV.UK (last update Sept 2025).

4.b The Headteacher is responsible for:

- ensuring all policies and procedures are followed by staff**;**
- ensuring all staff are appropriately trained in safeguarding procedures;
- ensuring everyone connected to the school is aware of this policy;
- ensuring the DSL works in accordance with all legislation and guidance;
- ensuring there is always cover for the role of DSL, for example through a confidential shared mailbox or equivalent system so that concerns are received, monitored and acted upon without delay;
- ensuring adequate resources are provided for all staff to undertake their role in safeguarding children and adults at risk;
- ensuring safe recruitment practices are in place and legislation is adhered to;
- liaising and seeking advice from the Local Authority Designated Officer (LADO) when the need arises and provide a written record for any LADO

referrals. The Headteacher will always follow procedure and protocol as set out by the LADO.

4.c The Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) is the MGS Deputy Principal. Cover is provided by the Deputy Designated Safeguarding Leads (DDSL). The DDSL for apprentices is an Assessor (MGA DDSL). The DDSLs for the wider School are the Headteacher, Assistant Headteachers, the Family Support and Attendance Officer and the PA to the Leadership Team.

The DSL will meet the responsibilities outlined in Annex B of Keeping Children Safe in Education (Sep 2026) and follow the Multi Agency Safeguarding Partners for RBWM procedures.

Key elements of the role of DSL:

- Promptly refer all cases of suspected abuse to the relevant Local Authority Children's Safeguarding Services or Family Help Services.
- Report any cases to the Police and DBS where appropriate.
- Liaise with the Headteacher to keep them informed of any issues, especially ongoing enquiries under Section 47 of the Children's' Act 1989, or police investigations.
- Act as a source of support, guidance and expertise on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Receive appropriate annual training and deliver this training to staff, volunteers, parents and governors as required.
- Have a working knowledge of how Local Authorities conduct Initial and Review Child Protection Conferences and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to, and understands the school's Safeguarding Policy and procedures, especially new and part time staff.
- Be able to keep detailed, accurate, secure electronic records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Ensure the school's policies are known and used appropriately.
- Work with the Governing Board to ensure that the School's Safeguarding Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Link with the local Multi Agency Safeguarding Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

- provide prompt written reports when required by any agency in connection with safeguarding;
- attend (or delegate this requirement to another appropriately informed member of staff) family support meetings, core groups, or other multi-agency planning meetings;
- ensure that all school staff know how to recognise and refer any concerns;
- Being alert to the specific needs of children in need, those with special educational needs and young carers.
- ensure annual training is provided for all staff and themselves undertake annual training.

Duties of the DSL that are specific to MGA are:

- being alert to the specific needs of adults at risk.
- leading any decision on a request for social transition from an apprentice under 18, in line with Keeping Children Safe in Education (Sep 2026) (see Appendix 2, point 13).
- working with the Apprenticeships Manager to ensure that the MGA Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed annually.
- ensuring the MGA Safeguarding Policy is available publicly and that parents and/or carers are aware of the fact that referrals about suspected abuse, neglect or exploitation may be made and the role of the school in this.
- where a child or adult at risk leaves MGA, ensuring their Safeguarding file is transferred to their new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained.
- seeking advice when there is any uncertainty regarding a concern about an apprentice who is child or adult at risk;
- considering any measures to be put in place to protect the apprentice following an allegation of abuse;
- only disclosing personal information about an apprentice to other members of staff on a need-to-know basis;
- ensuring that electronic records for the apprentice are kept up to date with brief entry of concerns and actions to provide a chronology and ensuring that an indication of further record-keeping is marked on the apprentice's records;
- ensuring that any apprentice currently on a Child Protection Plan, who is absent without explanation, is referred to their Social Worker at the Local Authority;
- where there is an allegation of abuse by an apprentice to another apprentice, ensuring that both apprentices are considered as vulnerable and in need of consideration for action to be taken; referral for each apprentices would be made, with all relevant parental and agency communication;

- meeting with the MGA DDSL on a weekly basis to ensure that they have a complete safeguarding picture for MGA.

4.d The MGA DDSL is responsible for:

- Uploading any concerns onto CPOMS;
- Informing the DSL of any concerns;
- Attending all training assigned by the DSL.
- Meeting as appropriate with the DSL.

4.e The Apprenticeship Manager is responsible for:

- Ensuring, as part of the employer engagement process, that each employer has a satisfactory safeguarding procedure in place.
- Ensuring that the apprentice has, as part of their induction process, read and understands this policy, and their employer's safeguarding procedures.

4.f All MGA staff

4f.i All staff are expected to fulfil the following duties:

- recognising that safeguarding is their main responsibility, as outlined in Keeping children safe in education 2026 and treating the welfare of children and adult at risk with the utmost importance;
- confirming on the IamCompliant they have read and understood this policy, the MGS Behaviour Policy and MGS Keeping Children Safe in Education Part 1 and adhering to the guidance/instructions in these policies;
- wearing the appropriately colour coded lanyard whilst in school to facilitate easy recognition of visitors to school and those who have not received a DBS clearance;
- remaining alert at all times to the signs of physical, emotional or sexual abuse, neglect or exploitation;
- exercising professional curiosity, recognising that apprentices may not feel ready or know how to tell someone they are being abused, exploited or neglected, or may not recognise their experiences as harmful, and working to build trusted relationships that make it easier for them to communicate;
- recognising that apprentices may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination, which can affect their welfare, wellbeing, mental health and willingness to seek help, and considering such concerns within safeguarding practice where appropriate;
- being aware that mental health problems can, in some cases, develop into safeguarding concerns and can be an indicator that an apprentice has suffered, or is at risk of suffering, abuse, neglect or exploitation, and following the guidance in Appendix 2, point 8;
- establishing and maintaining an environment where it feels safe to talk and where staff listen to children and adults at risk;

- ensuring that they conduct themselves correctly and in accordance with the school's Golden Rules at all times, both in and out of school, and do not put themselves at risk;
- taking every opportunity to preserve dignity when dealing with apprentices who are children or adults at risk;
- providing opportunities through the induction to address relevant issues and topics in order to promote apprentice safety and well-being and encouraging apprentices to assess risks to themselves.

4f.ii All staff are responsible for the following reporting and procedural duties:

- completing face-to-face Safeguarding training on reporting procedures, identifying signs of abuse and the effects of it, every two years
- receiving safeguarding and child protection updates, including online safety, at least annually;
- highlighting to senior staff and the Safeguarding team if they do not understand the policy and procedure around Safeguarding;
- knowing what to do if an apprentice makes a disclosure and not promising confidentiality to any apprentice, but always acting in the interests of an apprentice;
- being aware that they have a professional responsibility to keep safeguarding information confidential but also that staff must also share information with other agencies in order to safeguard children and adults at risk;
- taking notes and completing a Manor Green School concern form (available from the DSL) regarding any concerning remarks or marks on an apprentice and passing directly to the MGA DDSL;
- knowing the procedure to report concerns about an apprentice to the MGA DDSL;
- not adopting any change relating to social transition, such as using a different name or pronouns, and passing any request about it to the MGA DDSL straight away (see Appendix 2, point 13);
- knowing how to make a Family Help or Safeguarding Referral, reporting promptly any concerns of potential abuse;
- reporting any concerns they have on any aspect of the school community;
- alerting a line manager or a more senior person if they feel a person or school practice is placing an apprentice at risk;
- keeping up to date with changes in procedures.

4.g Apprentices are responsible for:

- being aware of what safeguarding is and both the contents of this safeguarding policy and that of their employer;
- reporting any concerns about themselves or another apprentice to their designated mentor or assessor;

- being aware that all staff are responsible for their welfare and that all concerns or issues raised will be treated in a respectful, non-judgemental manner;
- signing the Apprentice Commitment Statement to confirm that they have read, understood and agree to abide by this policy.

5. Who to report a concern to

5.a MGA staff - first point of contact:

MGA DDSL, Yvonne Meade, yvonne.meade@manorgreenschool.co.uk

5.b MGA DDSL - first point of contact:

Deputy Principal and DSL,
Warren Griffiths, warren.griffiths@manorgreenschool.co.uk /
T: 01628 513800 ex 2000 M: 07944 635443)

In the absence of the first point of contact, the MGA DDSL should contact:

- Headteacher and DDSL (Helen Hannam), helen.hannam@manorgreenschool.co.uk T: 01628 513800)

5.c Apprentice first point of contact - their mentor or assessor.

5.d In the event of a complaint against the Headteacher of MGS concerns should be **raised directly** with:

Colin Hayfield (Chair of Governors), colin.hayfield@manorgreenschool.co.uk

5.eWhere it is appropriate to involve social services
the Local Authority Designated Officer (LADO) for the Royal Borough of Windsor and Maidenhead at 07774 332675 or LADO@achievingforchildren.org.uk

Staff only: procedure for reporting a concern

6.a Reporting a concern that an apprentice is at risk

- Whenever a member of staff has a concern about an apprentice, they must complete a Safeguarding Concern form **as soon as possible** ensuring as much detail is entered as possible. Concern Forms are available on SharePoint, in all classrooms, and from the main admin corridor.
- If the apprentice is 18 or over, or you are not sure whether they are an adult at risk, use the flow chart in Appendix 3 to help you decide whether to report. If in doubt, report.
- **Personally** give the form to the Designated Safeguarding Lead (DSL) (or the Deputy DSL (DDSL) where the DSL is unavailable). **Call people out of meetings if necessary. This takes priority over anything else you have to do**.
- The Designated Safeguarding Lead (DSL) will discuss the concern with you to get clarification and further information. The DSL will make it clear the next steps to be taken and whether you will need to contribute further. If liaison is

required with Social Care or a Family Help/Safeguarding Referral is needed then this will be completed by the DSL.

- They will let you know if you need to remain vigilant for similar concerns and report them.
- When a safeguarding concern is raised about an apprentice, a safeguarding record will be opened for that student on CPOMS by the DSL. This will include a chronology of events and detailed case recording relating to any contact about that student. The safeguarding record will be on a secure electronic database.

IMPORTANT

- **If the DSL does not get back to you, you have a duty to check what action has been taken.**
- **If you are not satisfied an apprentice is safe, or feel your concern has not been dealt with appropriately, the duty to get help remains with you.**

6.b Escalating a concern that an apprentice is at risk

- If you are not satisfied that sufficient action has been taken about your concern then escalate this by speaking to the Headteacher.
- Remember there is no hierarchy in safeguarding. You can question anyone's actions to a member of the Safeguarding team: they have a duty to act on any information given to them.
- If you are still dissatisfied with the action taken within school, notify the Chair of Governors or the Governor for Safeguarding.
- You can also make direct Family Help/Safeguarding referrals to Local Authorities or contact the LADO if you have serious concerns or you feel the school's safeguarding team is not acting. Alternatively you can contact the NSPCC Whistleblowing Hotline (0800 028 0285) for advice.

6.c Disclosures of Abuse

- If an apprentice is disclosing an act of abuse against themselves, listen quietly without investigating, clarify using open questions, reassure them they are right to tell someone and inform them that you must tell someone else, i.e. that you cannot keep this information to yourself.
- Record in writing, dated and signed, who has made the disclosure and the nature of it. This record should be handed to the DDSL.

6.d Allegations of abuse made against staff/adults working for Manor Green School

- Any allegations or concerns about staff, volunteers, or contractors working in connection with the school need to be reported immediately to the Headteacher (Deputy Headteacher in their absence).
- If the allegation is about the Headteacher it should be reported immediately to the Chair of Governors.

- All concerns or allegations relating to staff, volunteers, or contractors that may meet the harm threshold will be passed on to the Local Authority Designated Officer (LADO). If required the LADO may inform the relevant police force.
- Concerns or allegations about staff, volunteers or contractors that do not meet the harm threshold will be shared and handled in accordance with the school's low-level concerns policy.
- If required, the LADO will convene a Strategy Meeting where next actions will be agreed. The member of staff at the centre of the allegation may be removed from duties and may be subject to agreed disciplinary procedures.
- The school will act in line with statutory guidance and legislation as outlined in Keeping Children Safe in Education (Sep 2026) .
- All employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide employee with a named contact if suspended.
- Reporting concerns is everyone's duty. Reporting concerns regarding a child or an adult will not prejudice your status, position, or employment within school. Failure to do so may be a disciplinary offence. (See Whistleblowing Policy).

6.e Allegations of abuse made against staff/adults working for an employer other than Manor Green School

- Any allegations or concerns about staff, volunteers, or contractors working in connection with the apprentices need to be reported immediately to the employer's Designated Safeguarding Lead (or equivalent) as identified in the employer's safeguarding policy.
- Any allegations or concerns about staff, volunteers, or contractors working in connection with the apprentices need to be reported immediately to the Headteacher (Deputy Headteacher in their absence).

6. Confidentiality and GDPR

- All matters relating to safeguarding are confidential. The Headteacher, DSL and DDSLs will disclose personal information about an apprentice to other members of staff on a need-to-know basis only.
- However, all staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and adults at risk and to balance the risk of sharing with the risk of not sharing.
- All staff must be aware that they cannot promise an apprentice to keep secrets which might compromise that apprentice's safety or well-being or that of another.
- We will always undertake to share our intention to refer an apprentice to Social Care with their parents /carers unless to do so could put the apprentice at greater risk of harm, or impede a criminal investigation.

- Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. Information may still be shared without consent if, there is good reason to do so, such as where safety may be at risk. Judgement should be based on the facts of the case. When sharing or requesting personal information, the basis upon which it is being done must be certain.
- The data protection laws (the Data Protection Act 2018, the UK GDPR and the Data (Use and Access) Act 2025) do not prevent the sharing of information for the purposes of keeping children and adults at risk safe. "Safeguarding of children and individuals at risk" is a processing condition that allows special category personal data to be shared without consent where appropriate. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote welfare.

7. Family Help and prevention

The provision of Family Help should form part of a continuum of help and support to respond to the different levels of need of individual children and adults at risk and their families. Family Help means providing support as soon as a problem emerges, with the aim of preventing escalation. Any apprentice may benefit from support before statutory intervention, including from universal services, community-based Early Help or the targeted early help level of Family Help.

Staff should, in particular, be alert to potential need for additional support, including Family Help, for an apprentice who:

- is disabled or has certain health conditions and has specific additional needs/special education needs;
- is a Young Carer;
- has a mental health need;
- is pregnant and/or is a parent themselves;
- is showing signs of engaging in anti-social/criminal behaviour;
- is showing early signs of abuse and/or neglect;
- is at risk of exploitation, modern slavery or trafficking, including criminal or sexual exploitation;
- is at risk of being radicalised into terrorism;
- has returned to home from care;
- is a care leaver;
- is privately fostered;

- is frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions or is at risk of being permanently excluded;
- has a parent or carer in custody or is affected by parental offending.

8. SEND Vulnerability

Children and adults at risk with special education needs (SEN) and disabilities face additional safeguarding challenges. Manor Green School Apprentices acknowledges that barriers can exist when recognising abuse, neglect or exploitation of these individuals. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child or adult at risk's disability without further exploration;
- children and adults at risk with SEN and disabilities can be disproportionally impacted by things like bullying without showing outwardly any signs;
- communication barriers and difficulties in overcoming these barriers.

9. Online safety

MGA takes a robust approach to the on-line safety of our apprentices in order to allow them to use technology in a safe environment. By implementing on-line filters and monitoring our IT systems we minimise four areas of risk (the "4 Cs"):

- **Content** - being exposed to illegal, inappropriate or harmful material (for example pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme violence, misinformation, disinformation and conspiracy theories).
- **Contact** - being subjected to harmful online interaction with other users or generative AI applications that simulate this.
- **Conduct** - personal online behaviour that increases the likelihood of, or causes, harm (for example, making, sending and receiving explicit images, including those generated using AI, and online bullying).
- **Commerce** - risks such as online gambling, inappropriate advertising, phishing and financial scams.

On-line safety guidance for staff is covered by School's Safeguarding Training sessions. Filtering and monitoring provision is reviewed at least once every academic year, in line with the Department for Education's filtering and monitoring standards.

For more information, see Appendix 2, points 9 and 10.

10. Safer recruitment

- All staff working for MGA have been recruited through MGS.

- As per part three of Keeping Children Safe in Education (Sep 2026), Manor Green has adopted robust recruitment procedures that help deter, reject or identify people who might abuse children or adults at risk.
- Manor Green's robust recruitment process is detailed in our 'Safer Recruitment and DBS Policy'.

11. Promoting awareness of this policy

We will raise awareness of this policy via:

- Staff and apprentice induction
- Publication on The National College portal (MGA staff and internal apprentices)
- Publication on Qualsdirect (external apprentices)
- Employer sign up process

12. Public Sector Equality Duty (Equality Act 2010)

MGA believes this policy does not prioritise or disadvantage any apprentice, member of MGA staff or partnering employer.

MGA recognises that apprentices may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination, which can affect their welfare, wellbeing, mental health and willingness to seek help. Concerns of this kind will be considered within safeguarding practice where appropriate and reported in the same way as any other safeguarding concern.

13. Monitoring and review

This procedure will be reviewed annually, taking into account any changes to legislation and guidance.

The Governing Board approved this policy on 5 October 2026.

Signed: Colin Hayfield, Chair of Governors

Signed: Helen Hannam, Headteacher and Principal

Date of review or revision	Description	Author or reviewing officer
March 2024	Guidance updates; clarification on wording and accountability	Apprenticeship Manager
September 2024	Guidance updates	Kate Hartup

January 2026	Annual review	Kate Hartup
September 2026	Guidance updates: references and wording updated in line with Keeping Children Safe in Education 2026	Jackie Evans

Appendices

Appendix 1: Definitions of terms and types of abuse

. An adult at risk is defined as a person who:

- is 18 years or over and
- (a)has needs for care and support (whether or not the authority is meeting any of those needs),
- (b)is experiencing, or is at risk of, abuse or neglect, and
- (c)as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it (The Care Act, 2014).

RBWM states that the six principles for safeguarding adults at risk are as follows:

- Empowerment – presumption of person led decisions and informed consent
- Prevention – it is better to take action before harm occurs
- Proportionality– proportionate and least intrusive response appropriate to the risk presented
- Protection – support and representation for those in greatest need
- Partnerships – local solutions through services working with their communities who have a part to play in preventing, detecting and reporting abuse, neglect and exploitation.
- Accountability – accountability and transparency in delivering.

There are four types of abuse covered by this Safeguarding Policy.

1) Physical abuse

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

Most children and many adults at risk will collect cuts and bruises and injuries, and these should always be interpreted in the context of the individual's medical / social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some individuals, however, will have bruising that is more than likely inflicted rather than accidental.

Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given; these can often be visible on the 'soft' parts of the body where accidental injuries are unlikely, e g, cheeks,

abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

Signs of physical abuse

The physical signs of abuse may include:

- Unexplained bruising, marks or injuries on any part of the body.
- Multiple bruises- in clusters, often on the upper arm, outside of the thigh.
- Cigarette burns.
- Human bite marks.
- Broken bones.
- Scalds, with upward splash marks.
- Multiple burns with a clearly demarcated edge.

Changes in behaviour that can also indicate physical abuse:

- Fear of parents or carers being approached for an explanation.
- Aggressive behaviour or severe temper outbursts.
- Flinching when approached or touched.
- Reluctance to get changed, for example in hot weather.
- Depression.
- Withdrawn behaviour.
- Running away from home.

2) Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of an individual such as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying to the individual that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the individual opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on an individual. These may include interactions that are beyond the individual's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the individual participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing the individual frequently to feel frightened or in danger, or the exploitation or corruption of an individual. Some level of emotional abuse is involved in all types of maltreatment of a child or adult at risk, though it may occur alone.

Signs of emotional abuse

Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive and grow, however, individuals who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of individuals not being allowed to mix or play with others.

Changes in behaviour which can indicate emotional abuse include:

- Neurotic behaviour e.g. sulking, hair twisting, rocking.
- Being unable to play.
- Fear of making mistakes.
- Sudden speech disorders.
- Self-harm.
- Fear of parent or carer being approached regarding their behaviour.
- Developmental delay in terms of emotional progress.

3) Sexual Abuse

Sexual abuse involves forcing or enticing an individual to take part in sexual activities, not necessarily involving a high level of violence, whether or not the individual is aware of what is happening. The activities may involve physical contact or non-contact activities, such as involving individuals in looking at, or in the production of, sexual images, watching sexual activities, encouraging individuals to behave in sexually inappropriate ways, or grooming an individual 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 children.

Signs of sexual abuse

All Staff and Volunteers should be aware that adults, who may be men, women or children, who use others to meet their own sexual needs may abuse individuals of both sexes and all ages. Indications of sexual abuse may be physical or from the individual's behaviour. In all cases, individuals who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

Pain or itching in the genital area.

Bruising or bleeding near genital area.

Sexually transmitted disease.

Vaginal discharge or infection.

Discomfort when walking or sitting down.

Pregnancy.

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn.
- Fear of being left with a specific person or group of people.
- Having nightmares.
- Running away from home.
- Sexual knowledge which is beyond their age, or developmental level.
- Sexual drawings or language.
- Bedwetting.
- Eating problems such as overeating or anorexia.
- Self-harm or mutilation, sometimes leading to suicide attempts.
- Saying they have secrets they cannot tell anyone about.
- Substance or drug abuse.

- Suddenly having unexplained sources of money.
- Not allowed to have friends (particularly in adolescence).
- If a child, acting in a sexually explicit way towards adults.

4) Neglect

Neglect is the persistent failure to meet an individual's basic physical and/or psychological needs, likely to result in the serious impairment of that person's health or development. It may include a failure to:

- Provide adequate food, clothing and shelter.
- Protect the individual from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate care-givers); or
- Ensure access to appropriate medical care or treatment.
- Respond to the individual's basic emotional needs.

It can be difficult to recognise neglect, however its effects can be long term and damaging.

The physical signs of neglect may include:

- Being constantly dirty or 'smelly'.
- Constant hunger, sometimes stealing food from others.
- Losing weight, or being constantly underweight.
- Inappropriate or dirty clothing.

Neglect may be indicated by changes in behaviour which may include:

- Mentioning being left alone or unsupervised.
- Not having many friends.
- Complaining of being tired all the time.
- Not requesting medical assistance and/or failing to attend appointments.

Appendix 2: Contextual Safeguarding Concerns

Contextual Safeguarding is the approach of understanding and responding to risk and harm to a child, young person or adult at risk that is beyond their families. It recognises that different relationships that are formed in neighbourhoods, schools or on-line can feature violence and abuse.

The DSL will attend the Local Authority's termly DSL Networking meetings which will share updates and briefings on local safeguarding issues**. The key issues are:**

1) Children Missing from Education

A student going missing from education is a potential indicator of abuse, neglect or exploitation. Being absent from education, particularly on repeat occasions and/or for prolonged periods, can also be a warning sign of a range of safeguarding concerns. By law the school has an admission register and an attendance register and all students are placed on both. The DSL is responsible for monitoring attendance and will notify the local authority when a student's attendance falls below 90% for a consistent period or has been absent without the school's permission for a continuous period of 10 school days or more. In addition to this the school will inform the local authority of any student who:

- Has been taken out of school by their parents and the school has received written notification from the parents they are being educated outside the school system.
- Has ceased to attend school and no longer lives within reasonable distance of the school.
- Has been certified by a medical professional as unlikely to be in a fit state of health to attend school.
- Are in custody for a period of more than four months.
- Have been permanently excluded.

2) Sexual Exploitation

This is a form of sexual abuse where individuals are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, individuals are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. If a child, or adult at risk, consent cannot be given, even where that individual believes they are voluntarily engaging in sexual activity. Sexual exploitation does not always involve physical contact and can happen online. Some of the following signs may be indicators of sexual exploitation:

- Children or adults at risk who appear with unexplained gifts or new possessions
- Individuals who associate with others involved in exploitation
- Children who have older boyfriends or girlfriends
- Children or adults at risk who suffer from sexually transmitted infections or become pregnant

- Children or adults at risk who suffer from changes in emotional well-being
- Children or adults at risk who misuse drugs and alcohol
- Children or adults at risk who go missing for periods of time or regularly come home late
- Children or adults at risk who regularly miss education or do not take part in education

3) Honour-based violence

So-called Honour Based Violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community. This includes Female Genital Mutilation (FGM) and Forced Marriage. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs causing long-lasting harmful consequences. Forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage.

Warning signs that FGM is about to occur to a girl can include a girl talking about:

- Being taken 'home' to family.
- A special occasion to 'become a woman'.

Indications that FGM has occurred can include a girl presenting as:

- Having difficulty walking, sitting, or standing.
- Spending longer than normal in the toilet.
- Have unusual behaviour after an absence from school.
- Be particularly reluctant to undergo normal medical examinations.

Warning signs that Forced Marriage is about to occur can include:

- Request for extended leave of absence of failure to return from a visit to a country of origin.
- Fear about forthcoming holidays.
- Prevented from going on to further/higher education.
- Reports of Domestic abuse or Family disputes.
- Self-harm, eating disorders, depression.
- Siblings within the family reported missing.
- The Marriage and Civil Partnership (Minimum Age) Act 2022 has raised the minimum age that a person can legally marry or be in a civil partnership to 18.

All forms of HBV are abuse and will be handled and escalated as such. If a child discloses to a Teacher that they have been a victim of FGM or a Teacher observes signs that FGM has been carried out then that Teacher has a legal responsibility to report this in person to the relevant Police Force within one working day; this duty cannot be passed to another member of staff although the Teacher will be supported

by the Designated Safeguarding Lead. If a member of staff who is not a Teacher has a disclosure of FGM made to them or observes signs that FGM has been carried out then they will immediately inform the Designated Safeguarding lead who will take the lead on reporting this.

4) Radicalisation – Prevent Duty

These duties should be read in conjunction with the MGA Prevent Policy. As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty Guidance: England and Wales (2023)'.

- We will protect apprentices from being drawn into terrorism by having robust safeguarding policies in place to identify those at risk, and intervene as appropriate. We will consider the level of risk to identify the most appropriate referral.
- We will ensure that our safeguarding arrangements take into account the policies and procedures of the Multi Agency Safeguarding Partners for RBWM
- We will make sure that annual staff training on PREVENT strategy gives them the knowledge and confidence to identify those at risk of being drawn into terrorism. Staff will know where and how to refer apprentices for further help.
- We will ensure apprentices are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering.
- The Leadership Team monitors behavioural and safeguarding concerns on a daily basis, with weekly monitoring focus in Leadership meetings.
- Ofsted, when assessing the effectiveness of the school, makes a judgment on the school's approach to keeping apprentices safe from the dangers of radicalisation and extremism.
- We promote the Fundamental British Values of democracy, the rule of law, individual liberty and mutual respect and tolerance for those with different faiths and beliefs. Through those, we contribute to our students' acceptance of our diverse society.

5) Child on Child Abuse

All staff should be aware safeguarding issues can manifest themselves via child on child abuse. It may be appropriate to regard an individual's behaviour as abusive if:

- Bullying/cyberbullying
- Prejudice-based and discriminatory behaviour, including racism and faith-targeted abuse
- Physical Abuse/causing physical harm
- Sexual violence/sexual assault/sexual harassment
- Up-skirting (which is now criminalised under the Voyeurism (Offences) Act 2019)

- The behaviour of the perpetrator includes sexual violence/sexual harassment
- Sexting

It will be the Designated Safeguarding Lead's professional judgement to determine whether abuse has taken place or was intended to take place. If abuse is identified then the DSL will refer the issue to Social Care.

6) Serious Violence

All staff should be aware of indicators, which may signal that individuals are at risk from, or are involved with serious violent crime. These may include:

- Increased absence from school;
- A change in friendships or relationships with older individuals or groups;
- A significant decline in performance;
- Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;
- Unexplained gifts or new possessions could also indicate that the individual has been approached by, or are involved with, individuals associated with criminal networks or gangs.

7) Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity, drug networks or gangs who groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any adult at risk over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults;
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation.

8) Mental Health

Mental Health problems can be a potential sign that a person is suffering or has suffered abuse. Poor mental health can also have a significant impact on a person's functioning and therefore hinder their ability to keep themselves safe from further

harm. In order to support our apprentices who are experiencing mental health issues, we have a range of emotional therapies which they can be referred to.

Mental health problems can, in some cases, develop into safeguarding concerns, including self-harm, suicidal ideation or risk of suicide. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, but staff are well placed to notice warning signs such as significant changes in behaviour, ongoing difficulty sleeping, withdrawing from social situations, not wanting to do things they usually like, and physical signs of self-harm or neglecting themselves. If staff have a concern about an apprentice's mental health that is also a safeguarding concern, they must follow this policy and speak to the MGA DDSL. If an apprentice is in danger, staff should call 999 or arrange for them to be taken to A&E immediately. If an apprentice needs urgent help with their mental health but it is not an emergency, staff can get help from NHS 111 online or by calling 111 and selecting the mental health option.

9) On-Line Safety

Manor Green School takes a robust approach to the on-line safety of our students in order to allow them to use technology in a safe environment. By implementing on-line filters and monitoring our IT systems (overseen by our ICT Manager and team), therefore blocking harmful and inappropriate content without unreasonably impacting teaching and learning, we can minimise four areas of risk (the "4 Cs"):

- Content; being exposed to illegal, inappropriate or harmful material (for example pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme violence, misinformation, disinformation and conspiracy theories)
- Contact; being subjected to harmful online interaction with other users or generative AI applications that simulate this
- Conduct; personal online behaviour that increases the likelihood of, or causes, harm (for example, making, sending and receiving explicit images, including those generated using AI, and online bullying)
- Commerce; risks such as online gambling, inappropriate advertising, phishing and financial scams

The Head of Wellbeing and Safeguarding and ICT Manager carry out audits twice a year of our on-line safety management supported by an on-going risk assessment. The Safeguarding Governor will also review our On-Line safety procedures when carrying out the Safeguarding Audit twice a year.

Additional advice and guidance regarding On-Line safety can be found the UK Safer Internet Centre:

https://saferinternet.org.uk/guide-and-resource/teachers-and-school-staff/appropriate-filtering-and-monitoring

10) Consensual and non-consensual sharing of indecent images and videos

Manor Green school will ensure that staff and apprentices are aware to treat the consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as “sexting”) as a safeguarding concern where any individual involved is under 18.

Staff will receive appropriate training regarding child sexual development and will understand the difference between sexual behaviour that is considered normal and expected for the age of the student, and sexual behaviour that is inappropriate and harmful. Staff will receive appropriate training around how to deal with instances of sharing nudes and semi-nudes in the school community, including understanding motivations, assessing risks posed to students depicted in the images, and how and when to report instances of this behaviour.

Staff will be aware that creating, possessing, and distributing indecent imagery of children is a criminal offence, regardless of whether the imagery is created, possessed, and distributed by the individual depicted; however, staff will ensure that students are not unnecessarily criminalised.

Staff will also be made aware that the laws imposed on the sharing of nudes and semi-nudes applies to digitally manipulated and AI-generated imagery.

Where a member of staff becomes aware of an incidence of sharing nudes and/or semi-nudes, they will refer this to the DSL as soon as possible who will act accordingly.

11) Vaping

We have a statutory duty to promote our students’ physical and mental health. In the past few years there have been a significant spike in children Vaping. Where we have cases of this with our students, we will look to provide the relevant support so that they are able to cease this habit, thus meeting our pastoral responsibilities. We will be led by the ‘Managing Vapes in Schools’ guidance provided by the Association of Directors of Public Health (available in the ‘Safeguarding’ section of our website)

12) Modern Slavery

We have a duty to be aware of signs that someone may be a victim of modern slavery. These signs include the apprentice:

- Appearing scared or untrusting
- Having poor hygiene or looking unkempt
- Being isolated from family or the local community
- Having no access to their passport or identity documents

Any concerns must be reported to the DSL as soon as possible.

13) Gender-questioning children and social transition

Keeping Children Safe in Education (Sep 2026) includes statutory guidance on children who are questioning their gender. At MGA this applies to apprentices under 18. Social transition means changes such as a different name, pronouns, uniform or appearance.

When a request is raised, MGA will:

- not initiate or suggest social transition. The guidance applies only where an apprentice, or their parent or carer, raises a request;
- ensure that staff do not adopt any change relating to social transition, such as using a different name or pronouns, unless MGA has made a decision led by the DSL. Staff must pass any request to the MGA DDSL straight away;
- treat social transition as an active intervention that can have significant effects on an apprentice's wellbeing and longer-term outcomes, and take a very careful approach, considering the apprentice's best interests, the impact on other children and the safety of everyone;
- involve parents and carers as a matter of priority, and give their views great weight, unless involving them could put the apprentice at risk of harm. In that case the DSL must be involved before any decision is made;
- be professionally curious about the apprentice's experiences and any wider vulnerabilities, such as mental health, bullying or SEND, and deal with any concerns under this policy;
- not allow supporting any degree of social transition to include access to toilets, changing rooms or overnight accommodation designated for the opposite biological sex. Apprentices aged 11 or over must not undress in front of someone of the opposite biological sex. The DSL will consider suitable alternative arrangements, such as single-occupancy facilities;
- keep a clear, concise record of the request, the decision and the reasons on CPOMS; and
- not tolerate bullying, harassment or discrimination.

Apprentices aged 18 or over are adults. If one of them asks for support, they should be referred to the Apprenticeship Manager and the DSL.

14) Other causes of safeguarding

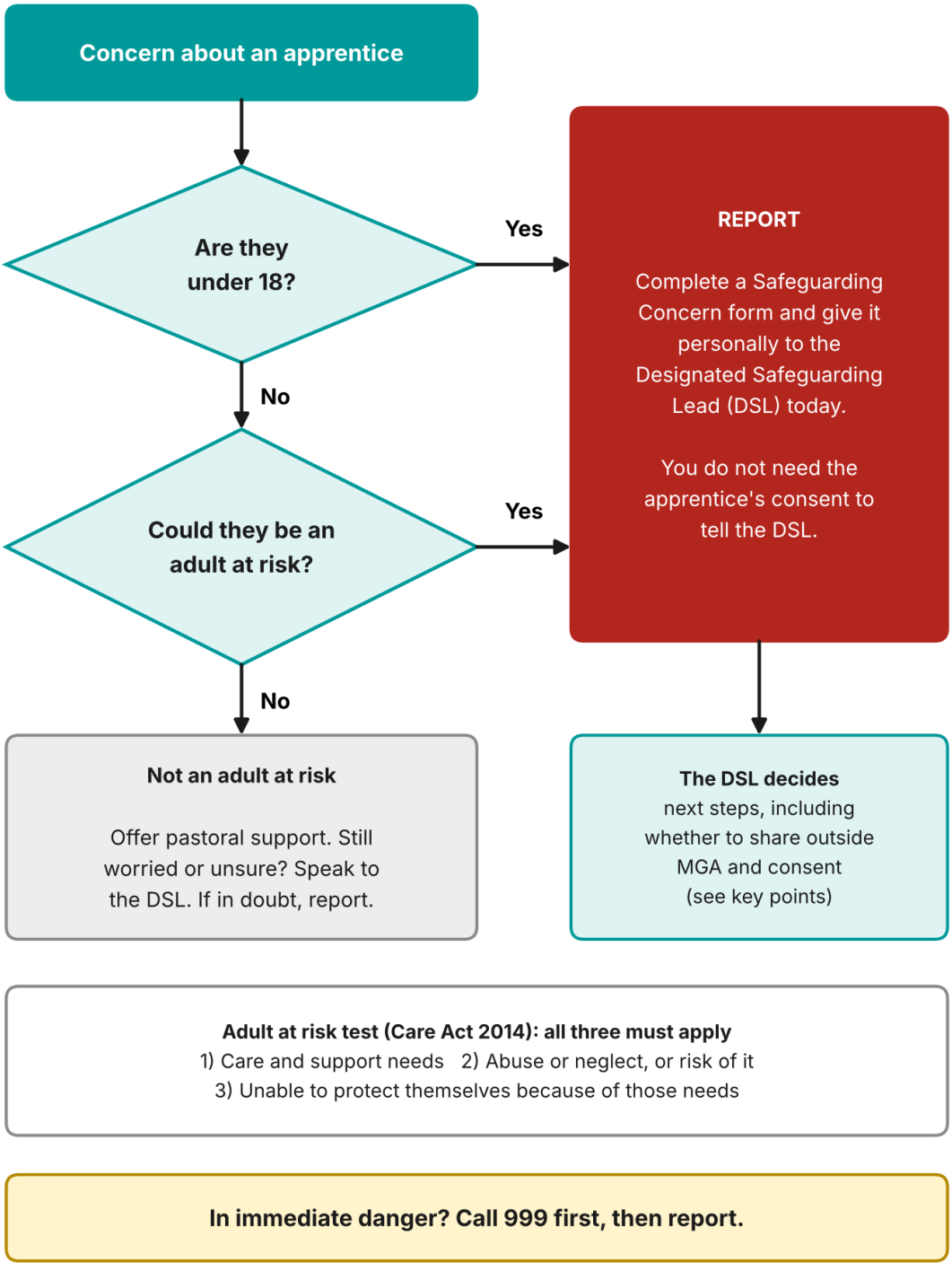
Other causes for safeguarding concern include:

- Children/ adults at risk missing from home/care
- Children/ adults at risk with family members in prison
- Domestic Abuse
- Homelessness
- Substance/Alcohol Misuse

These are covered in more detail in the MGS Safeguarding Policy.

Appendix 3: Adult at risk: do I report?

Use this chart if you have a concern about an apprentice. If you are not sure, report it. You do not need to decide whether the concern is serious enough on your own.



Key points

- Anyone can raise a concern. You do not need the apprentice's consent to tell the DSL or DDSL, and the concern will be recorded on CPOMS.

- An adult at risk is a person aged 18 or over who has care and support needs, is experiencing or at risk of abuse or neglect, and cannot protect themselves because of those needs (see Appendix 1).
- The DSL decides whether to share information outside MGA, for example with adult social care or the police. Where the adult has capacity, their consent to share should normally be sought and their wishes respected.
- Information may be shared without consent where, for example, other people (including children) are at risk, a serious crime is suspected, a life is at risk, the person is being coerced or controlled, a member of staff or someone in a position of trust is involved, or there is a legal duty to share.
- If the adult does not have capacity to make the decision, MGA will act in their best interests under the Mental Capacity Act 2005.
- Never promise confidentiality. Record the reasons for any decision to share, or not to share, without consent.