

Quality Procedures and Policies	HS-011	Issue Number	19
		Issue Date	April 2025
Safeguarding and Child Protection		Originator	Peter Hurlstone
		Amended by	Peter Hurlstone
		Approved by	Tracy Simper

1. Scope

This document sets out Southampton Engineering Training Association's (SETA) responsibilities for staff and representatives with regards to safeguarding all individuals. It relates to all situations, both internal and external, where SETA encounters an individual.

2. Commitment

SETA, as a provider of training and assessment in the UK, is committed to safeguarding the interests of all individuals. SETA believes that anyone who participates in any learning activities is entitled to do so in an environment that is both safe and enjoyable.

SETA will aim to safeguard individuals by:

- *Having a zero tolerance approaches to abuse*
- *Valuing them, listening to and respecting them*
- *Maintaining policy, procedures and a code of conduct (where applicable) for staff and representatives*
- *Recruiting representatives safely by ensuring all necessary checks are made in line with current government guidance and legislation*
- *Updating staff and representatives on the relevant policy and procedures and providing access to relevant information*
- *Ensuring that all assessments, communications, documentation, records, materials, personnel deployment, processes and procedures in no way undermine the interests of individuals, but actively seek to protect them*
- *Respecting confidentiality whilst sharing information about concerns with agencies who need to know and appropriately involving parents and carers of individuals as necessary*
- *Providing effective support and management for staff and representatives*
- *Recognising that sexual harassment is not acceptable and will not be tolerated*
- *Promoting that sexual harassment and sexual violence is not 'banter' or a 'joke'*
- *Recognising that the touching of other individuals body parts such as the bottom or breasts is not normal behaviour*
- *Takes a collective 'Centre' approach to safeguarding, which includes all individuals connected to SETA*
- *Protecting SETA staff and representatives from unsubstantiated allegations of improper conduct*
- *Ensuring that victims of sexual violence or sexual harassment are protected and offered appropriate support*
- *Recognising the signs of Safeguarding concerns and the necessary action to be taken*

3. Implementation

To achieve the successful implementation of this policy, SETA will:

- *Make available this Safeguarding policy to all its staff and representatives to ensure that it should be available on request to learners and other interested parties*
- *Provide development activities/updates appropriate to the needs of staff and representatives when required*
- *Ensure that issues concerning safety and confidentiality are addressed as an integral part of qualification development, review and assessment guidance*

- *Maintain the Safeguard team which will oversee the development and implementation of the policy and to advise on changes and amendments as appropriate*
- *Require that all staff and representatives have completed a DBS check*
- *Require that all staff and representatives complete a new DBS check every 3 to 5 years*
- *Require center to ensure that visitors are accompanied and made identifiable during visits to centers*

4. General Definitions

Individual

For the purposes of this Policy, the term 'individual' relates to:

- *Staff*
- *Trustees*
- *Contractors*
- *Customers*
- *Visitors*
- *All learners*
- *Children*
- *Vulnerable adults*

Representatives

Representatives refers to anyone who is contracted to act on behalf of members of SETA and who encounter learners or receive learners' work for assessment purposes for example.

Children

The term 'children' refers to a child who has not yet reached their eighteenth birthday in England, Wales and N. Ireland.

Vulnerable Adults

For the purposes of this policy the term 'vulnerable adult' refers to someone over the age of 18 to whom 'regulated activity' is provided.

Consent

Consent occurs when an individual voluntarily agrees to the proposal or desires of another. All individuals should have freedom of choice regarding any acts of a sexual nature and have the right to object whenever they wish to, whenever they like.

Safeguarding Concern or Report

This refers to a concern that is reported by staff to the Safeguarding team.

Referral

A referral is a concern that has been referred to an outside agency, such as the 'Children's Resource Service' from a result of a safeguarding concern that was raised by staff; referrals are facilitated via the DSL.

Regulated Activity

'Regulated activity' is a broad term which applies to:

- *Specified activities relating teaching, training, instruction, assessment, care or supervision for example, which is carried out on a frequent (at least once a week), or intensive (more than three days in any 7-day period), basis or overnight between the hours of 18:00 and 06:00, where the activity gives the person the opportunity to have face-to-face contact with individuals*
- *Certain work in a specified place external to SETA's premises which provides the opportunity for frequent contact with individuals such as a School, College or workplace*

- *Certain specified positions where SETA staff hold a position of trust in an external organisation, such being an active member of a professional body for example*

Non-regulated activity

This is any activity or work carried out by SETA representatives not relating to SETA or authorised by SETA's Officers or trustees. SETA does not engage in or condone any type of this activity. Those found doing so will be subject to SETA's disciplinary process (**Please See 'STF-008 - Conditions of Employment and Induction' and 'LER-004 - Discipline and Disciplinaries'**).

5. Safeguarding Concern Definitions

Please see **Annex A** for a list of definitions.

6. Legislation and Regulation

SETA recognises the following key Legislation:

- *Children Act 1989*
- *Children and Young Persons Act 2008*
- *Children Act (Scotland) 2020*
- *The Children's Order (Northern Ireland) 1995*
- *Safeguarding Vulnerable Groups Act 2006*
- *Protection of Freedoms Act 2012*
- *Keeping Children Safe in Education 2023*
- *Criminal Justice and Court Services Act 2000*
 - *Section 28 - Disqualification from working with children: adults*
 - *Section 35 - Persons disqualified from working with children: offences*

Contracting with SETA

Under the Criminal Justice and Court Services Act 2000 Section 35, it is an offence punishable by imprisonment to apply for work with children and/or vulnerable adults if an individual has been:

- *Included (otherwise than provisionally) in the list kept under section 1 of the Protection of Children Act 1999 (individuals considered unsuitable to work with children)*
- *Subject to a direction under section 142 of the Education Act 2002 (prohibition from teaching, given on the grounds that he is unsuitable to work with children)*
- *Included, on the grounds that he is unsuitable to work with children, in any list kept by the Secretary of State or the National Assembly for Wales of persons disqualified under section 470 or 471 of the Education Act 1996*
- *Subject to a disqualification order*

If such information is received because of criminal records check from the Disclosure & Barring Service (England & Wales) or Disclosure Scotland or Access NI, the individual will be reported to the police upon discovery by the Designated Safeguard Lead (DSL).

SETA recognises that it is an offence for anyone knowingly to employ such a person in such a capacity, either on a voluntary or a paid basis; SETA abides by this ruling.

7. Operational Framework and Responsibilities

Structure

SETA carries out its responsibilities in relation to safeguarding through a 'Safeguard team' as follows:

Name	Position
Tracy Simper	DSL (Pastoral Services)
Peter Hurlstone	DSL (Centre Compliance Manager)
Russ James	Safeguarder (Operations Manager)
Honor Hurlstone	Safeguarder (Engagement Services Liaison)
Lily Lavall	Safeguarder (Work-based Learning Manager)
Tracey Peerless	Safeguarder (Student Welfare & Development)

Please see **Annex B** for a list of general duties and how the structure is formed.

Responsibilities

DSL

- *Act as the Lead on all Safeguarding matters*
- *Act as a source of advice on safeguarding matters*
- *Receive copies of the Safeguarding concerns raised via the online 'MyConcern' system and act as 'triage' on some occasions*
- *Select members of the Safeguarding team to deal with concerns raised via the online MyConcern system where required*
- *Carry out, receive and review copies of DBS Checks requiring decisions*
- *Respond to communications made to the Safeguarding email address*
- *Be a member of the Safeguard team*
- *Co-ordinate action within SETA and liaise with the appropriate authorities or agencies about suspected or actual cases of abuse*
- *Provide guidance and support to those dealing with any issues about safeguarding children or vulnerable adults involving the inappropriate behavior or actions of a member of SETA or representatives*
- *Advise on safeguarding training within SETA*
- *Undergo necessary training and qualifications as and when required*
- *Organise and implement staff training for the MyConcern online reporting system*
- *Be familiar with the latest Keeping Children Safe in Education (KCSIE) document*
- *Organise and deploy training across the Staff at regular times throughout the year*
- *Send Staff newsletters and bulletins on current subjects and trends as necessary*
- *Triage and assign concerns raised via the MyConcern and MyVoice online reporting platforms*
- *Monitor and deal with Senso Cloud alerts and report as required to the Chief Executive Officer and HR*

Where possible, the DSL will be identified and nominated based on their experience which may include registration and/or experience as a social worker for example, and some time spent on the safeguarding team.

The DSL is designated by and is accountable to the Chief Executive Officer.

Safeguarder

- *Act as a source of advice on safeguarding matters*
- *Deal with Safeguarding concerns as raised and shared by the DSL via the online MyConcern system*
- *Respond to communications made to the Safeguarding email address*
- *Be a member of the Safeguarding team*
- *Co-ordinate action within SETA and liaise with the appropriate authorities or agencies about suspected or actual cases of abuse*

- *Undergo necessary training and qualifications as and when required*
- *Assist the DSL with staff training for the MyConcern online reporting system*
- *Be familiar with the latest KCSIE document*

Safeguarding team

- *Review all safeguarding concerns that are reported by members SETA, representatives or external sources (e.g. learners, parents or center staff)*
- *Make judgements about what action, if necessary, should be taken in relation to any reported concern*
- *Proactively seek to develop SETA's expertise and identification of good practice regarding Safeguarding in relation to the development and implementation of assessment and qualifications*
- *Consider issues of interest, sharing views and good practice and, where relevant, propose solutions and/or alternative approaches to managing and implementing Safeguarding policy*
- *Ensure that SETA is appropriately represented at any relevant external groups, meetings or consultations in this area*
- *Identify and report any strategic and policy matters to the Centre Compliance Manager as appropriate*
- *Appoint Safeguard team members*
- *Manage internal/external communications*
- *Undergo necessary training and qualifications as and when required*

Other Staff

- *Are responsible for their own actions and behavior and should avoid any conduct which would lead any reasonable person to question their motivation and intentions*
- *Should work, and be seen to work in an open and transparent way*
- *Should discuss and/or take advice promptly from the DSL or member of staff over any incident, which may give rise to concern*
- *Should wear lanyards to remain identifiable to visitors, apprentices, customers and suppliers.*
- *Report concerns via the MyConcern online portal*
- *Must Apply the same professional standards regardless of individual characteristics*
- *Should know the name of their designated person for safeguarding and be familiar with safeguarding arrangements and understand their responsibilities*
- *Should be aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action being taken against them*
- *Undergo necessary training and qualifications as and when required*
- *Be familiar with Part 1 of the latest KCSIE document*

Team Meetings

The Safeguard team will hold monthly meetings to discuss topics such as:

- *Safeguard team updates*
- *Safeguarding and Prevent updates in line with national policies and legislation*
- *News and current affairs regarding National and International Safeguarding and Prevent topics*
- *Current documented concerns and/or referrals*
- *Action planning*
- *HMI Ofsted requirements*
- *Training and CPD opportunities*
- *General concerns across the center*
- *MyConcern reports*

All meetings are minuted and communicated across the Safeguard team and are held on the secured server at the following location: [Y:\11-Safe Guarding - Secure\9. Meetings](#)

8. Recruitment into the Safeguard team and Disclosure

When new positions in the Safeguard team open, SETA will advertise the positions to existing staff who can apply in writing to the DSL. Each application will be considered and discussed between the Safeguard team. Suitable applicants will be shortlisted for interview by the Team and the position filled when a decision is made.

SETA requires all staff to undertake an enhanced 'Disclosures Barring Service (DBS)' check every three years, which in turn ensures all applicants/members of the Safeguard team are subject to the check. This helps prevent unsuitable individuals from working with all individuals at SETA.

The information received will be treated with the utmost confidentiality and will only be used by the Safeguard team to reach a conclusion as to whether a contract of services should be offered to the applicant. SETA complies fully with the relevant criminal records checking guidelines issued within the UK by The Disclosure & Barring Service (England & Wales)

SETA shall reject any applicant who refuses to complete a criminal records check. Please see **STF-002 - Disclosure and Barring Service (DBS)** for further information.

Recruitment of ex-offenders

Having a criminal record will not necessarily bar an applicant from working with SETA. SETA undertakes not to unlawfully discriminate against any individual based on information revealed in the Disclosure documentation. Any action taken based on such information will depend on the nature of the role and the circumstances and background of the offence. SETA's Officers will discuss each individual application received from those with a criminal record in consultation with the Safeguard team.

Code of Conduct for Safeguarders

To provide guidance as to what constitutes appropriate behavior in terms of safeguarding individuals, SETA has produced a 'Code of Conduct' (**Please See Annex C**). All Safeguarding representatives are required to read and forward a signed copy of the Code of Conduct to the Center Compliance Manager, who in turn will record the agreement on the secured Safeguarding server.

9. Reporting Procedures

It is vital that any member of SETA and its representatives who suspects that an individual is at risk of harm or abuse take personal responsibility to report their concerns; not reporting concerns may put an individual at further risk of harm. It is not SETA's responsibility to investigate an individual's safeguarding concern, but to review the information provided and where necessary, escalate to the relevant authorities.

SETA's policy is that every suspected concern should be reported, even if it may not be a Safeguarding concern. SETA believes it is better to report something that may not be a concern, so it can be determined by the DSL's. It may well turn out to be a Safeguarding concern after all, that someone else less trained may not realise.

SETA firmly believes in early intervention.

Concerns about safeguarding may arise in different situations. Staff and representatives may:

- *Witness/observe/notice something firsthand*
- *Receive information by phone/email/letter/in person*
- *Receive learners work that raises potential safeguarding concerns*

MyConcern Online Reporting Tool

SETA subscribes to the 'MyConcern' online reporting system, provided by 'The Safeguarding Company', which is the main way in which Safeguarding concerns are reported. All staff have access to this system via a username and password and receive training on its use. Any staff member can use the system to report a concern that will

go directly to the DSL's, who in turn will decide the best cause of action and assign the case to a member Safeguarding team.

SETA hosts an online form called 'MyVoice', which is an extension of the MyConcern portal. This can be used by any individual, such as employers of apprentices, customers, visitor, apprentices, parents and carers when they feel they may have a safeguarding concern relating to a person connected to SETA. The concern will go directly to the DSL, where it can be triaged and investigated.

Please see policy **HS-026 - MyConcern Safeguarding Reporting Tool Security** for more information on systems security protocols

Imminent Risk of Harm

If at any point there is a risk of immediate serious harm to an individual, the DSL, or another member of the team must be informed immediately in verbal capacity.

Responding to Safeguarding Concerns

The following guidance is to be followed any staff member or representative receives a disclosure from an individual:

- *Do not turn them away, it may be that the individual is comfortable talking to you and disclosing information*
- *Do not wait for a break or the end of the day; let them talk to you immediately*
- *Do not promise confidentiality. Be honest with the individual and inform them that you may have to report the concern/share information you are disclosed with the Safeguard team (Under the UK GDPR/Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk)*
- *Listen to what is being said with an open mind*
- *Be clear and tell them that you are not investigating, but rather listening*
- *Do not judge the individual in any way*
- *Do not ask probing or leading questions designed to get them to reveal more*
- *Never stop a person who is freely recalling significant events*
- *Check their understanding of the situation, without being investigative*
- *If you can, make mental note of the discussion, the timing, setting and people present as well as what was said*
- *Do not disclose the individual's situation or any details with any other individuals except those on the Safeguard team*
- *If you are in a situation where you feel the Police or emergency services are required, act and make the call*

Once they have finished talking to you, remember to inform them if you are going to report your concern to the Safeguard team, provided in your judgement you believe there is a lawful basis to do so, such as where they are at risk of harm.

Use the MyConcern online portal to make the report the concern at

<https://myconcern.thesafeguardingcompany.com/> or <https://form.thesafeguardingcompany.com/b0ffafe4-b030-4b5d-812f-bf29b21e785c>

The report should be used to record as much information as possible about the concern, to include:

- *The name of the individual/s who is/are the subject of the concern and any other individuals that are associated to it*
- *A summary of the concern*
- *A date and time of the concern*
- *The origin of the concern*

- *Specific details of the concern*
- *The location of the incident*
- *Any action taken*
- *Completion of the online body map tool*

Any written notes and details taken must be uploaded as an attachment where necessary.

It is important that staff and representatives record what information they have, even if the informant has only divulged a little or will not give their details; the information may join up with reports from someone else. All information should be treated as confidential, and staff and representatives must not talk about this information with anyone other than their agreed Safeguarding contact, as rumor spreads quickly, can be damaging and may even obstruct any investigation that may result.

Concerns raised by members of the Safeguarding team can be sent to a selection of notification groups as follows, where staff can decide who best receives it:

- *DSL (TS/PH)*
- *Safeguarding Team (HH/TP/LL/RJ)*

When a report of concern is sent direct to the DSL, they will decide if it should be dealt with by another member of the Safeguarding team and will designate it accordingly.

Concerns raised using MyConcern and MyVoice to will do directly to the DSL's only when raised by general staff and other individuals.

Responding to a Safeguarding Concern Report

The notification group members will investigate the report as the caseworker once assigned by the DSL and record their findings on the MyConcern online web portal, including any advised actions. The DSL will follow up on the report and decide what action to take. They will not start a safeguarding investigation, but will make sure, if necessary, that the following authorities have the information they need to decide themselves what to do next:

- *Children's Resource Service will be contacted if a Safeguarding referral is necessary involving an individual under 18 years of age (i.e. a Child)*
- *Hampshire Safeguarding Adults Board (HSAB) will be contacted if a Safeguarding referral is necessary involving an individual over 18 years of age (i.e. an Adult)*

The Safeguarding team will treat all information received with complete discretion and will maintain as much confidentiality as possible whilst making sure that action is taken to safeguard the individual. All information given will be treated seriously and with respect for the person providing it.

Allegations of abuse made against SETA Staff and/or representatives

All staff are expected to provide a safe and supportive environment, which secures the well-being and very best outcomes for learners. However, the nature of SETA's work means that tensions and misunderstandings can occur during interactions between staff and learners, and staff behaviors may give rise to allegations being made against them. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event.

If an allegation of abuse is made directly to the staff member or representative, they must inform the Safeguarding team via the MyConcern online portal at <https://myconcern.thesafeguardingcompany.com/>, as soon as possible.

If an allegation of abuse is made to the DSL or Safeguard team about a staff member or representative, they will inform the individual in question that an investigation will be instigated, and HR will be consulted.

In all cases of allegations of abuse made against SETA Staff and/or representatives, SETA may suspend them from their contractual duties while the matter is investigated under guidance of HR.

All allegations will be carefully investigated, having regard to confidentiality.

Information sharing

If the allegation could constitute a potential risk of abuse to an individual, SETA will always share the information with relevant agencies to protect them. If there is insufficient information to enable a referral, then the reasons for this will be recorded.

SETA recognises its responsibility to protect the identity of anyone reporting suspected or actual abuse, and no information will be made available externally without careful consultation and prior approval at senior level.

SETA will always follow the seven golden rules for sharing information (including personal information) **(Please See Annex D)** as set in the HM Government document '*Information Sharing - Advice for practitioners providing safeguarding services for children, young people, parents and carers*'.

10. Developing Safe Working Practices for the Safeguarding of Learners

SETA recognises its duty of care in assisting all individuals establish the safest possible learning and working environments. SETA aims are to safeguard its learners and reduce the risk of staff being falsely accused of improper or unprofessional conduct. The following information lists the conduct that should be applied to each given area.

Staff

Staff are responsible for the way in which they exercise authority, manage risk, use resources, and protect learners from discrimination and avoidable harm. All staff, whether paid or voluntary, are duty bound to keep learners safe and to protect them from physical and emotional harm.

Employers have a duty of care towards their employees under the Health and Safety at Work Act 1974 which requires them to provide a safe working environment for staff and guidance about safe working practices. The Act also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings.

All Staff should:

- *Understand the responsibilities, which are part of their employment or role, and be aware that sanctions will be applied if these provisions are breached*
- *Avoid any conduct which would lead any reasonable person to question their motivation and intentions*
- *Take responsibility for their own actions and behaviour*

Exercise of Professional Judgement

No guidance can provide an exhaustive list of what is or is not appropriate behaviour for staff. Guidance does highlight, however, behavior that is illegal, inappropriate or inadvisable. There will, however, be occasions and circumstances in which staff will have to make decisions or act in the best interest of the learner which could contravene this guidance or where no guidance exists. In short, where there is no specific guidance, staff should:

- *Discuss the circumstances that informed their action, or their proposed action, with their line manager. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted*
- *Always discuss any misunderstanding, accidents or threats with a line manager*
- *Always record discussions and actions taken with their justifications*

Power and Positions of Trust

As a result of their knowledge, position and/or the authority invested in their role, all adults working in education settings are in positions of trust in relation to the learners in their care. There is potential for exploitation and harm of vulnerable people, and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Wherever possible, staff should avoid behavior which might be misinterpreted by others, and report and record any incident with this potential. Staff should not use their:

- **Position** to gain access to information for their own advantage and/or a learner or learner's family's detriment
- **Power** to intimidate, threaten, coerce or undermine learners
- **Status** and standing to form or promote relationships, which are of a sexual nature

Confidentiality

Staff may have access to confidential information about learners to undertake their everyday responsibilities. In some circumstances, staff may be given additional highly sensitive or private information. They should never use confidential or personal information about a learner or her/his family, for their own or others' advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass a learner.

Confidential information should never be used casually in conversation or shared with any person, other than on a need-to-know basis. In circumstances where the learner's identity does not need to be disclosed, the information should be used anonymously.

There are certain circumstances in which a member of staff may be expected to share information about a learner, for example, when abuse is alleged or suspected. In such cases, individuals have a duty to pass on information without delay, but only to those with designated safeguarding responsibilities.

If a member of staff is in any doubt about whether to share information or keep it confidential, they should seek guidance from the DSL, or a member of the Safeguarding team. Any media or legal enquiries should be passed to the Officers.

All Staff therefore:

- *Are expected to treat information they receive about learners in a discreet and confidential manner*
- *Who are in any doubt about sharing information they hold, or which has been requested of them should seek advice from a senior member of staff*
- *Need to be cautious when passing information to others about a learner*

Propriety and Behavior

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of learners. They should adopt high standards of personal conduct to maintain the confidence and respect of their peers, learners and the public.

Staff should not use any form of degrading treatment, although the use of humour can help to defuse certain situations. The use of sarcasm, demeaning or insensitive comments towards learners is not acceptable in any situation.

An individual's behaviour, either in or out of the workplace, should not compromise their position within the work setting.

Staff should **avoid**:

- *Behaving in a manner which would lead any reasonable person to question their suitability to work with learners or act as a role model*
- *Making sexual remarks to a learner (including email, text messages, phone or letter)*
- *Discussing their own sexual relationships with, or in the presence of, learners*
- *Discussing a learner's sexual relationships in inappropriate settings or contexts*
- *Entering or encourage inappropriate or offensive discussion about sexual activity*
- *Making (or encourage others to make) unprofessional personal comments which scapegoat, demean or humiliate, or might be interpreted as such*
- *Entering in any type of personal relationship with a Learner (friendly or sexual)*

Dress and Appearance

A person's dress and appearance are matters of personal choice and self-expression. However, staff should consider the manner of dress and appearance appropriate to their professional role, which may be different to that adopted in their personal life.

Staff should ensure they are dressed decently, safely and appropriately for the tasks they undertake. Those who dress or appear in a manner which could be considered inappropriate could render themselves vulnerable to criticism or allegations.

Staff should wear clothing which:

- *Promotes a positive and professional image*
- *Is appropriate to their role*
- *Is not likely to be viewed as offensive, revealing, or sexually provocative*
- *Does not distract, cause embarrassment or give rise to misunderstanding*
- *Is absent of any political or otherwise contentious slogans*
- *Is not considered to be discriminatory*

Infatuations and/or Unwanted attention

Staff need to be aware that it is not uncommon for learners to show unwanted attention towards a member of staff and/or develop an infatuation.

All situations should be responded to sensitively to maintain the dignity of all concerned.

Staff should also be aware that such circumstances always carry a high risk of words or actions being misinterpreted and of allegations to be made against staff.

Should a learner display any unwanted attention towards a member of staff (inappropriate language/touch/invading personal space etc.), or a member of staff becomes aware that a learner may be infatuated with them or a colleague, they must report this at the earliest opportunity to the DSL or a member of the Safeguarding team. In this way, steps can be taken to avoid hurt and distress for all concerned.

Staff should report any indications (verbal, written or physical), that suggest a learner may be infatuated with a member of staff.

Social contact, including social media

Staff should not establish or seek to establish social contact with learners for the purpose of securing a friendship or to pursue or strengthen a relationship. Even if a learner seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response and be aware that such social contact could be misconstrued.

Social Media platforms such as Facebook, Twitter, Snapchat, WhatsApp and Instagram for example, form a large part of modern society and can be accessed at a moment's glance, any time of the day, and by individuals all over the world using a plethora of devices such as smartphones and tablets. Personal information, such as images, references to family members or a person's whereabouts for example, can be shared, viewed and downloaded by individuals worldwide. This means that it could be highly likely that a staff member may be approached to join such a platform by a learner and must be discouraged.

Staff should therefore:

- **Not** connect with any Learner on personal social media accounts (Join, accept/send friend requests, search for or comment on posts, for example)
- **Not** share their personal contact details, including telephone number/s, e-mail address, social media details, home address or whereabouts with learners
- **Not** ask learners for their personal contact details, including telephone number/s, e-mail address, social media details, home address or whereabouts with learners
- **Decline** friend requests and messages from Learners
- Report and record any situation, which they feel might compromise them or their own professional standing to the DSL, or a member of the Safeguarding team

Physical Contact

Physical contact should be avoided in all circumstances, but there may be rare occasions when it is entirely appropriate and proper for staff to have physical contact with learners and other individuals. It is crucial that they only do so in ways appropriate context to their professional role, such as administering First Aid for example, where a First Aider is required to make physical contact with the casualty to help them.

When physical contact is made with learners it should be in response to their needs at the time, of limited duration and appropriate given their age, gender, ethnicity and background. Staff should, therefore, always use their professional judgement.

Physical contact should never be secretive, or for the gratification of the adult, or represent a misuse of authority.

If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported as soon as possible.

Where feasible, staff should seek the learner's permission before initiating contact. Staff should therefore:

- Be aware that even well-intentioned physical contact may be misconstrued by the learner, an observer or by anyone to whom this action is described
- Never touch a learner in a way which may be considered indecent
- Always be prepared to explain actions and accept that all physical contact be open to scrutiny
- Never indulge in horseplay, tickling or fun fights
- Report all situation of contact to the DSL or a member of the Safeguarding team

One to One Situations

Staff working in one-to-one situations with learners may be more vulnerable to allegations. Staff should recognise this possibility and plan to conduct such meetings accordingly. Every attempt should be made to ensure the safety and security needs of both staff and learners are met. Staff should therefore:

- Avoid meetings with learners in remote or secluded areas or locations
- Ensure there is visual access and/or an open door in one-to-one situations
- Inform other staff of the meeting beforehand, assessing the need to have them present or close by
- Avoid use of 'engaged' or equivalent signs wherever possible. Such signs may create an opportunity for secrecy or the interpretation of secrecy

- *Always report any situation where a learner becomes distressed or angry to the DSL or a member of the Safeguarding team*

Transporting Learners and other Individuals

The transporting of learners and/or other individuals by staff must be avoided. There may, however, be occasions when learners may need to be to hospital in emergency situations, for example.

Large numbers of learners and individuals should be transported using a reputable private transporting contractor organised by Pastoral Support Services.

Emergency Situations

In an emergency such as an accident, either a trained first aider or a member of the Safeguarding team will transport the Learner or individual to hospital, should an ambulance not be appropriate. They should remain with them for the duration of the visit if they are under 18 years of age or arrange for a parent or guardian to relieve them.

Educational Visits and Trips

Staff should take particular care when supervising learners in the less formal atmosphere of a visit or trip, as they remain in a position of trust, and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship.

Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts. Staff should therefore:

- *Seek authorisation from the DSL's and/or the Centre Compliance Manager*
- *Always have another adult present unless otherwise agreed with the DSL's and/or the Centre Compliance Manager*
- *Undertake a risk assessment to include emergency contact details*
- *Have a supply of petty cash for use in the event of an emergency*
- *Carry a First Aid kit*
- *Ensure that their behaviour always remains professional*
- *Report compromising situations to the DSL or a member of the Safeguarding team*

Information Technology (IT)

SETA has clear policies about access to and these of computer, smart devices and the internet. Under no circumstances should staff or learners use SETA equipment to access inappropriate or indecent material. This means that staff should follow SETA's policy on the use of IT equipment (**Please See CEN-020 - Information Technology**). Staff equipment is locked to the 'Private' network, whilst equipment that Apprentices use is locked to the 'BYOD' network; they are both heavily restricted and not accessible to each other.

Senso Safeguarding Cloud

SETA uses the 'Senso Safeguarding Cloud' platform to monitor all SETA owned computers and laptops used by Staff¹ and Learners, which notifies the DSL's via email if any urgent or critical violations are detected, allowing them to prioritise Learners and Staff who need immediate attention and support.

The system provides advanced monitoring tools where DSL's receive e-mail alerts for Safeguarding concerns which allows them to assist Learners who may be at risk, vulnerable, or intending to cause harm to themselves or others.

¹ The Chief Operating Officer (CEO) and Finance Manager (FM), or equivalent are exempt from this policy and requirement for the software to be installed due to rules and responsibilities within the Financial Services Authority (FSA) and Financial Conduct Authority (FCA). This exemption ensures compliance with relevant financial governance standards and maintains the integrity of executive financial oversight. Computer used solely for examinations also will not be monitored.

The system **will** be used:

- Solely for Safeguarding and Prevent purposes, which enhances Learner safety
- In line with the latest version of the KCSIE and other connected UK regulations and guidelines
- To continuously monitor and identify potential safety concerns
- To automatically intercept devices for certain keywords from a database provided by the 'Internet Watch Foundation' and the 'Counter-Terrorism Internet Referral Unit'. This includes the use of swear words, foul language and inappropriate conversations, all of which will be reported to the DSL's via e-mail, including the phrase, severity, username, device, category and the application that was running
- To log all internet traffic and sites visited by Staff and Learners, including the machine name, username, time and date, which will be visible to the DSL's at any time required
- To automatically capture 'Screenshots' of the user's PC/Laptop screen when a word or phrase is recognised, including the username, time and date, which is sent to the DSL's
- To monitor the entire computer/laptop, which includes MS Teams conversations², MS Word/Excel/PowerPoint writing, website pages, online forms, search history, PDF's, notepad and text editing software etc. Any violation will be picked up and reported to the DSL's
- To identify trends and local Prevent issues that may be on the rise

The system **will not** be used:

- To intentionally spy on Staff or Learners
- To collect evidence in incidents unrelated to Safeguarding and/or Prevent
- To monitor any other device connected to SETA's Wi-Fi network, such as personal laptops and smartphones connected to SETA's BYOD network
- By any unauthorised and untrained staff (Currently SETA's DSL's only)
- Without being configured to ensure confidentiality, integrity and availability of data
- By SETA's IT contractor NetPrimates, apart from facilitating the setup, installation and maintenance of the client software installed on each SETA owned machine, and its online platform

When an alert is received, the following actions will be carried out:

1. The DSL's will review the report and decide the next steps
2. If there is no concern, it will be marked as 'Resolved' as a 'False Positive'³, with no further action required
3. If there is a concern, it will be marked as 'Needs Immediate Action' or 'Investigating' at the discretion of the DSL. It will be logged as a Safeguarding concern on the 'MyConcern' portal and either dealt with by the DSL or assigned as a case to a member of the Safeguarding team as necessary. The Safeguarding member dealing with the concern will not have access to the Senso system, but will be made aware of the key details of the concern so they can deal with it
4. The 'Notes' section will be completed with all the information required, and when the case is complete, it will be marked as 'Resolved' as either a 'False Positive' or 'True Positive'⁴ and the case will be closed. The case on MyConcern will also be amended/updated to reflect the action/s required or taken
5. With regards to Staff, there may be an instance where a report needs to be shared with SETA's Chief Executive Officer (CEO) and HR Dept. depending on the situation, severity and outcome of the investigation

All data collected by the system remains the property of SETA and must be used in accordance with this section in this policy.

² Casual, harmless conversations that do not pose a risk to an individual's safety or well-being will not be considered safeguarding concerns. Safeguarding measures will focus on interactions that indicate potential harm, abuse, neglect, or exploitation

³ A False Positive is where the system flagged a harmless keystroke by mistake and is of no real concern.

⁴ A True Positive is where the system flagged a real Safeguarding and/or Prevent concern and will be treated as a Safeguarding concern.

Out of work activities

Staff should under no circumstances arrange to/meet Learners outside of work activities. This is deemed inappropriate behaviour and is not acceptable. Staff will face disciplinary proceedings should such activities take place.

Staff personal mobile phone use

Staff should under no circumstances use their personal phone for any work purpose. Contacting Learners, employers and subcontractors for example, would mean that Staff are sharing their own personal number and putting themselves at risk of possible:

- *Unwanted phone calls/MMS/SMS messages*
- *Harassment*
- *Unwanted/uncontrolled third party sharing of the number*
- *Abuse via text messaging/MMS/SMS*
- *Being contacted out of hours*
- *Divide between work and personal life compromised*
- *Increased stress of not being able to 'withdraw' the number from use*
- *Unwanted marketing contact*
- *Unwanted additional cost to personal mobile phone bill*
- *Damage to phone not covered by work insurance*

Should a staff member be contacted for any reason via their personal mobile phone, they should:

- *Inform the caller that this is their personal phone, and not to contact it again*
- *Offer an alternative number, such as the main SETA line if there is no work direct dial available*
- *Block the number immediately on their phone*
- *Inform a member of the Safeguarding team their personal number has been compromised*

All key staff at SETA have a direct dial telephone number that should be used for contacting Learners, Parents, Guardians and contractors for example, as authorised. Other key staff are issued with a company mobile smartphone, such as the external assessment team for use to contact individuals during work hours, as authorised, their cohort of Learners in the workplace for example.

Staff Emergency Contact

The Management team have access to all staff members' personal mobile phone numbers and next-of-kin details in the event of an emergency. Contact will be made only in the event of an emergency, or if it is believed, there is a welfare concern.

11. Visitors and Employers

All individuals entering SETA's premises are required to sign in using an iPad in the reception area and must always wear an identification lanyard.

SETA has a 'Safeguarding and Prevent' booklet (**Please See Annex E**), which can be issued to:

- *Visitors to the Centre (also made available in SETA's reception area)*
- *Employers of Learners during their 'sign-up' stage*
- *Employers of Learners as and when it is updated/amended*

A 'SETA Safeguard team' Poster (**Please See Annex F**), for people to refer to in the case of need will be on display in and around the Centre at the following locations:

First Avenue Building

- All classroom (Rooms 1 to14)
- Female toilets
- First-Aid room/access toilet
- Front Staff room
- Reception Entrance
- Safeguarding information notice board
- Schools' area notice board
- Smoking area
- Staff male toilets
- Staff room
- Upper mezzanine office
- Visitors/students canteen
- Visitors/students male toilets
- Workshop information notice board

Second Avenue

- First-Aid room/access toilet
- Front Staff room
- Inner office notice board
- Kitchen hallways notice board
- Male and Female toilets

Risk Assessment

All individuals entering SETA's premises are required to have a Risk Assessment completed on them prior to their visit (**Please See 'HS-020 - Visiting External Speakers and External Based Activities' for further details**).

12. Training (Including Prevent)

SETA will endeavor to ensure that all staff understand key aspects of Safeguarding, including sexual violence and sexual harassment, what to do in the event they recognise it, or have a concern that requires reporting.

The Safeguard team members regularly attend workshops within the ALPHI network and the NCFE.

Safeguard team Qualifications

The following qualifications are held or being worked towards, across the Safeguard team:

Awarding Body	Qualification
Royal Bank of Scotland Mentor eLearning	Safeguarding (England and Wales)
MHFA England	Mental Health First Aider
CDP Group	A guide to Safeguarding Certificate of achievement
NCFE CACHE	Level 2 Certificate in Understanding Safeguarding and Prevent
TQUK	Level 2 Certificate in Safeguarding, Prevent and British Values (RQF) (2020 update)
NaCTSO	ACT Awareness e-learning Certificate
SETA	Safeguarding and Prevent Training Update
LearnMyWay	Certificate of Digital Skills – Online Safety
NSPCC	Keeping Children Safe Online
NSPCC	Safeguarding 16-25 Year Olds (England and Wales)
DfE	Prevent Trainer
The Home Office	Prevent Online Training

The National College	Mental Health & Wellbeing Strategies to Facilitate Pupils' Emotional Recovery after Remote Education
Southampton City Council	Level 3 Designated Safeguard Lead (DSL only)
ECP	Designated Safeguarding Lead Role in FE (DSL only)
ECP	Safer Recruitment (DSL only)
TNC	Mental Health & Wellbeing Strategies (DSL only)
ETF	Prevent for Further Education (FE) and Training
ETF	Practical Framework for Understanding Radicalisation
ETF	Safeguarding in Further Education and Training
ETF	Safer Recruitment in Further Education and Skills

Staff Training

All SETA staff undergo the following training as a minimum:

- Safeguarding awareness training - *delivered by the Department for Education's Prevent Regional HE/FE Coordinator for the Southeast of England annually, which is refreshed throughout the year during sessions held by the DSL*
- NaCTSO ACT e-learning Certificate – *Completed every 3 years, which is refreshed throughout the year during sessions held by the DSL*
- Home Office Prevent On-line – *Completed every 3 years, which is refreshed throughout the year during sessions held by the DSL*
- Lockdown - *Completed at Staff induction and refreshed annually*
- MyConcern online system - *Completed at Staff induction release and updated during staff inset days*
- Keeping KCSIE – *Appropriate parts Read and understood by all staff annually upon release*

Learner Training

All Apprentices undergo the following Safeguarding training as a minimum:

- Safeguarding awareness training - *delivered by the Department for Education's Prevent Regional HE/FE Coordinator for the Southeast of England on an annual basis, typically in September as part of SETA's induction. This is refreshed throughout the year during tutorials and sessions held by the DSL*
- NaCTSO ACT e-learning Certificate – *Completed during their first year off-the-job training*
- Home Office Prevent On-line – *Completed during their first year off-the-job training*
- Lockdown- *Completed during their first year off-the-job training typically in September as part of SETA's induction*
- Mental Health Awareness - *Completed during their first year off-the-job training typically in September as part of SETA's induction and refreshed during weekly tutorials*

Please refer to **TI-001 - Centre Training Register** for an exhaustive and current list of all training activities, including Safeguarding and Prevent at SETA.

13. External Support

It is always possible that reading or talking about safeguarding will cause distress, particularly if staff or representatives have had direct experience themselves. Any individual requiring further advice or support will be offered the option to contact the following organisations:

NSPCC Child Protection Helpline

If an individual is worried specifically about a child, even if they are unsure, they can contact the NSPCC's professional counsellors for help, advice and support on **0808 800 5000** or at help@nspcc.org.uk

Childline

If an individual is 18 or under and would like to talk with someone, Childline offers free, confidential advice and support whatever the worry, whenever help is needed. They can be contacted on **0800 1111**.

Samaritans

The Samaritans are for anyone who is struggling to cope with things and needs someone to listen to without judgement or pressure. They can be contacted on **116 123** or at jo@samaritans.org

Campaign Against Living Miserably (CALM)

CALM is leading a movement against suicide. They can be contacted on **0800 58 58 58**, 5pm to midnight every day of the year.

SOS (Silence of Suicide)

SOS exists to provide free group meetings in a safe physical space or in an online setting, where anyone affected by suicide can talk openly and honestly about their thoughts of suicide. They can be contacted on **0300 1020 505**, 4pm to midnight, or at support@sossilenceofsuicide.org every day of the year.

Children's Resource Service

The aim of the Children's Resource Service is to ensure that children and their families receive the right help at the right time regarding the safety of a child. They can be contacted via telephone on **(023) 8083 2300** during office hours, or on **(023) 8023 3344** out of hours.

Hampshire Safeguarding Adults Board (HSAB)

The HSAB provides a wide range of useful information and resources for members of the public and professionals who may be concerned about adult abuse or neglect. They can be contacted on **0300 555 1386** during office hours, or on **0300 555 1373** out of hours.

SETA actively seeks help from some of these agencies and will continue to do so when the need arises.

14. Contact

The Safeguard team can be contacted either via:

- *In person*
- *Any member of staff*
- *e-mail at safeguarding@seta-training.co.uk*
- *SMS text message on **07594 299517***
- *By calling **07594 299517** (24hrs)*
- *By calling **(023) 8087 8310** (Mon to Thurs 08:00 to 16:15, Fri 08:00 to 15:00)*
- *Online at <https://form.thesafeguardingcompany.com/b0ffafe4-b030-4b5d-812f-bf29b21e785c>*

Everyone in the Safeguard team has access to the safeguarding e-mail address on their work PC; no other individuals have access.

SETA has a designated mobile telephone that has access to sending and receiving e-mails at the Safeguarding address as well as sending and receiving text messages and telephone calls. The service is manned by at least one person from the Safeguard team 24 hours per day, 365 days per week, which ensures any individual can contact the team, should the need arise.

15. References

DfE

Keeping Children Safe in Education

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Working Together to Safeguard Children

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Sexual Violence and Sexual Harassment between Children in Schools and Colleges

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

Safeguarding Practitioners Information Sharing Advice

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

The Charity Commission

Safeguarding Duties for Charity Trustees

<https://www.gov.uk/guidance/safeguarding-duties-for-charity-trustees>

Equality and Human Rights Commission

What Equality Law means for you as an Education Provider - Further and Higher Education

https://www.equalityhumanrights.com/sites/default/files/what_equality_law_means_for_you_as_an_education_provider_further_and_higher_education.pdf

WHO

Female Genital Mutilation

<https://www.who.int/news-room/fact-sheets/detail/female-genital-mutilation>

Disclosure & Barring Service (England & Wales)

<https://www.gov.uk/disclosure-barring-service-check/contact-disclosure-and-barring-service>

Children's Resource Service

<https://www.southampton.gov.uk/children-families/childrens-social-care/report-a-concern-about-a-child/childrens-resource-service/>

Hampshire Safeguarding Adults Board (HSAB)

www.hampshiresab.org.uk

The Safeguarding Company (MyConcern Online Reporting Tool)

<https://myconcern.thesafeguardingcompany.com/>

Senso Safeguarding Cloud

<https://senso.cloud/en-GB/safeguard-cloud-online-monitoring-and-safeguarding>

16. Other Relevant Policies and Procedures

Please refer to the following list for further detailed information regarding policies and procedures used in accordance with this document:

- *HS-001 - Health and Safety Policy*
- *HS-004 - Risk Assessment*
- *HS-006 - First Aid*
- *HS-007 - Critical incident Management Plan*
- *HS-008 - Building Evacuation*
- *HS-009 - Lone Working*
- *HS-010 - Home Working*
- *HS-014 - Drug and Alcohol Abuse*
- *HS-020 - Visiting External Speakers and External Based Activities*
- *HS-021 - Bullying and Harassment*
- *HS-022 - Health and Safety Incident Reporting*
- *HS-023 - Prevention of Extremism and Radicalisation*

- *HS-025 - Protect Duty Compliance (Martyn's Law)*
- *HS-026 - MyConcern Safeguarding Reporting Tool Security*
- *CEN-002 - Information Advice and Guidance*
- *CEN-003 - Whistle Blowing*
- *CEN-004 - Safer Recruitment of Apprentices*
- *CEN-006 - Freedom of Expression*
- *CEN-008 - Equality of Opportunities*
- *CEN-009 - DATA Protection and UKGDPR Compliance*
- *CEN-011 - Digitally Recorded Media of Individuals*
- *CEN-012 - Ethical Trading, Anti-Slavery and Human Trafficking*
- *CEN-020 - Information Technology*
- *CEN-021 - Closed Circuit TV (CCTV) Monitoring*
- *CEN-029 - Privacy Policy*
- *CEN-032 - Anti-Bribery and Corruption*
- *LER-003 - Code of Conduct*
- *LER-004 - Learner Disciplinarys*
- *LER-005 - Cause for Concern*
- *LER-015 - Apprentice Absence and Reporting*
- *STF-001 - Recruitment and Selection*
- *STF-002 - Disclosure and Barring Service (DBS)*
- *STF-004 - Safer Recruitment*
- *STF-013 - Staff Training and CPD*
- *STF-014 - Nuisance Calls and Cold Callers*

17. Record Keeping

All records regarding Safeguarding and Prevent are stored electronically on the server in a secured folder at the following location [Y:\11-Safe Guarding - Secure\](#) and on the restricted MyConcern online reporting portal.

18. Review

This document will be reviewed annually by the DSL's or as and when new/amendments to UK legislation/s are released.

PLEASE NOTE

This section contains graphic details that some individuals may find upsetting. Information described within this document is for information purposes only.

SETA recognises the following situations as Safeguarding concerns. This is however a non-exhaustive list, and the Safeguard team and/or the Designated Safeguard Lead (DSL) would consult an external organisation depending on the situation as identified in **Section 13**.

Rape (Sexual Violence)

Rape is an act of sexual violence where a male individual commits the offence of rape if he intentionally penetrates the vagina, anus or mouth of another individual with his penis, without consent.

Assault by Penetration (Sexual Violence)

Assault by Penetration is an act of sexual violence where an individual commits the offence if he/she intentionally penetrates the vagina or anus of another individual with a part of his/her body, or anything else without consent.

Sexual Assault (Sexual Violence)

Sexual Assault is an act of sexual violence where an individual commits the offence of sexual assault if he/she intentionally touches another person sexually without consent.

Female Genital Mutilation (Sexual Violence)

Female genital mutilation (FGM), also known as female genital cutting, female genital mutilation/cutting and female circumcision, is the ritual cutting or removal of some, or all of the external female genitalia for non-medical reasons. It is generally carried out in countries such as Africa, Asia and the Middle East where it is commonly performed without consent on females between infancy and the age of 15, although it can be performed on at any point of a woman's life. The World Health Organisation (WHO) state that '*The practice has no health benefits for girls and women*' and '*FGM is a violation of the human rights of girls and women*'.

Sexual Harassment

Sexual harassment is unwanted behavior of a sexual nature, and could be a one-off incident or an ongoing pattern of behavior. It can happen in person or in other ways, for example online through things like email, social media or messaging tools. Such examples include:

- *Flirting, gesturing or making sexual remarks about someone's body, clothing or appearance*
- *Asking questions about someone's sex life*
- *Telling sexually offensive jokes*
- *Making sexual comments or jokes about someone's sexual orientation or gender reassignment*
- *Displaying or sharing pornographic or sexual images, or other sexual content including e-mails, text messages, video clips, photographs, posters, emblems/symbols or any other offensive material*
- *Physical conduct such as touching or grabbing parts of another individual's body against their will*
- *Unwelcome sexual behavior, including unwanted suggestions, propositions or advances*
- *Coercion, including pressure for sexual favors*
- *Inappropriate personal contact, including intrusion by pestering or spying*

SETA recognises that sexual harassment and sexual violence, either in physical or verbal form can occur either between:

- *Two individuals*
- *A group of individuals and a single individual*
- *Two a group of individuals*

Harmful Sexual Behavior

According to the NSPCC, *'harmful sexual behavior is developmentally inappropriate sexual behavior which is displayed by children and young people and which may be harmful or abusive. It can be displayed towards younger children, peers, older children or adults. It's harmful to the children and young people who display it, as well as those it is directed towards'*.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or 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 a child for example. An important indicator of abuse is where bruises or injuries are unexplained or the explanation does not fit the injury.

Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of an individual such as to cause severe and persistent adverse effects on their emotional state, or development as in the case of a child. It may involve making an individual feel, or believe they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may involve serious bullying causing them frequently to feel frightened or in danger, or the exploitation or corruption of them. Some level of emotional abuse is involved in all types of ill treatment of an individual, though it may occur alone.

Neglect

Neglect is the persistent failure to meet an individual's basic physical and psychological needs, and is likely to result in the serious impairment of their health, or development as in the case of a child. It may involve a parent or carer failing to provide adequate food, shelter and clothing, failing to protect an individual from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of an individual's basic emotional needs.

Financial Abuse, Discriminatory Abuse & Institutional Abuse

- *Financial abuse is abuse or misuse of possessions or money. Indicators may be an unusual shortage of money to pay bills, to buy food or to maintain adequate living conditions.*
- *Discriminatory abuse is harassment or similar discriminatory or derogatory treatment which is racist, sexist or refers to disability.*
- *Institutional abuse or Practice abuse is neglect due to bad or poor care practice or unsatisfactory professional practice and low standards.*

Self-Harm

Self-harm is when an individual hurts themselves as a way of dealing with very difficult feelings, painful memories or overwhelming situations and experiences. After self-harming, they may feel a short-term sense of release, but the cause of their distress is unlikely to have disappeared. Self-harm can also bring up very difficult emotions and could make some individuals feel worse.

Substance and Alcohol Abuse

Substance and Alcohol Abuse is the use of a substance (such as glue, petrol, legal and illegal drugs etc.), or alcohol in amounts or by methods which are harmful to the individual or others. In addition to possible physical, social, and psychological harm, the use of some drugs may also lead to criminal penalties.

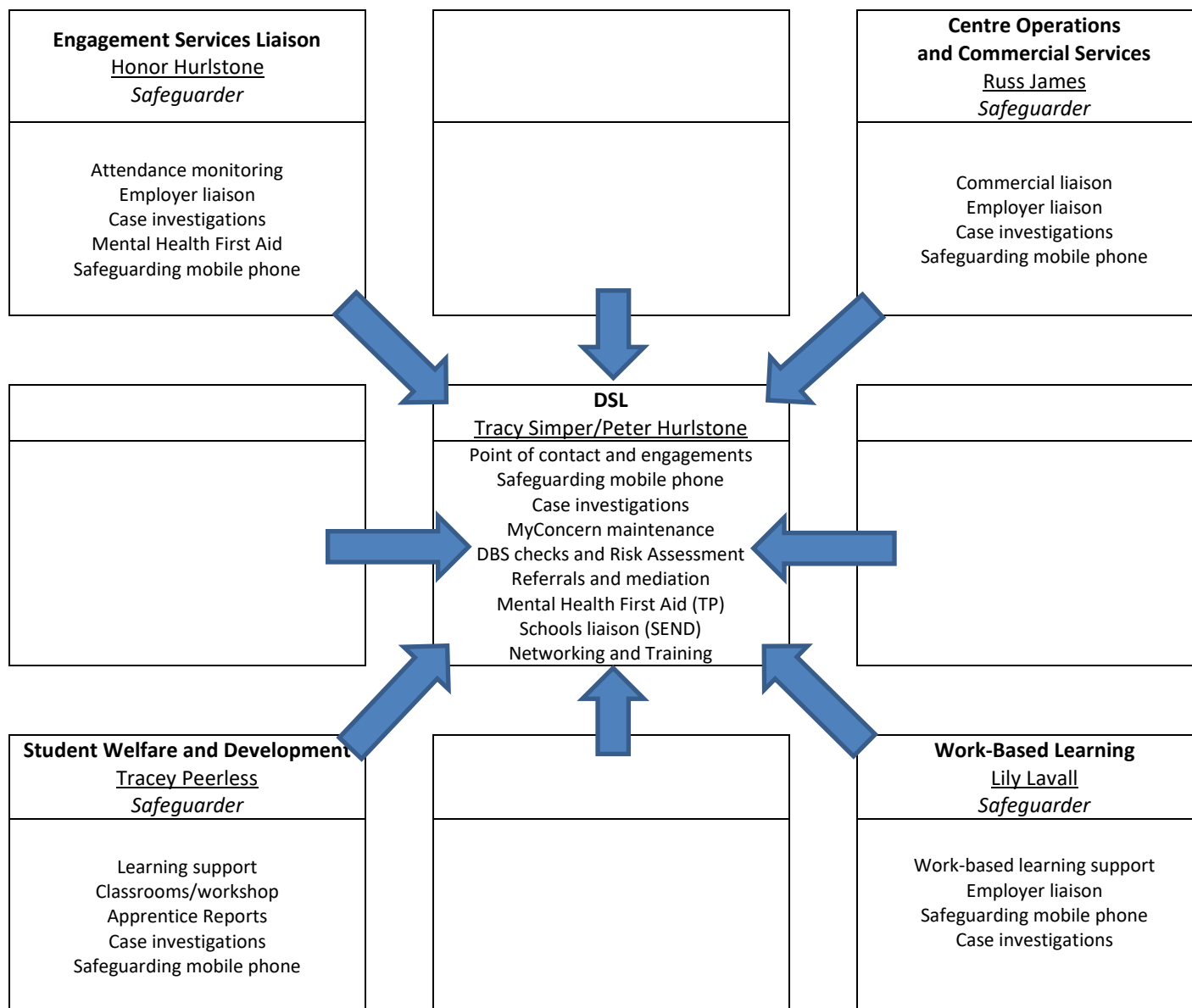
Homelessness

The definition of homelessness means not having a home. An individual would be homeless if they have nowhere to stay and are living on the streets. Homelessness can also mean that an individual is staying in a hostel, night shelter, or Bed and Breakfast on a temporary arrangement due to them not having their own home, for example.

Child on Child Abuse

Child on Child abuse is inappropriate behaviours between children that are abusive in nature including physical, sexual, or emotional abuse, exploitation, sexual harassment, all forms of bullying, coercive control, hazing/initiation rituals between children and young people, both on and offline (including that which is within intimate personal relationships).

Ref: <https://safeguarding.network/content/safeguarding-resources/peer-peer-abuse/>



All SETA safeguarding representatives are required to acquaint themselves with SETA's policies and procedures on Safeguarding, including the following Code of Conduct.

Code of Conduct

As a representative, you **must**:

- *Listen to, value and respect everyone as an individual*
- *Appropriately involve individuals in to decision making*
- *Encourage and praise them for coming forward and confiding in you*
- *Actively contribute to an organisational culture where inappropriate behaviour is not tolerated*
- *Provide an example of the good conduct you wish others to follow*
- *Ensure that whenever possible, there is more than one other adult individual present during activities with children and vulnerable adults, or at least that you are within sight or hearing of others*
- *Report all allegations/suspicions of abuse to the 'MyConcern' online portal*
- *Seek further support and guidance, including any allegation made against yourself or other staff from the DSL/DDSL as required*
- *Ensure you keep up to date with current appropriate legislation, such as the KCSIE and other such training as required*
- *Ensure that any concerns about inappropriate behaviour are quickly and appropriately reported on to the Safeguarding team within SETA*
- *Be aware that some individuals may behave inappropriately. Any sanctions and approaches to discipline used must be appropriate to age and understanding*

Representatives who come into contact with children, vulnerable adults and other individuals must always avoid:

- *Being alone or out of sight of others. Where privacy is required, the door should be left ajar having ensured that others have been informed and are within earshot*
- *Transporting learners via their own vehicle*
- *Having unnecessary physical contact*
- *Engaging in or allowing sexually provocative games or activities*
- *Making or permitting suggestive or discriminating remarks to/or about any individual*
- *Meeting children, vulnerable adults or other individuals outside of organised/formal interaction*
- *Entering an area where individuals may be changing their clothes, or are not fully dressed*
- *Participating in, tolerating or the promotion of bullying*
- *Not engage in relationships (including sexual), with learners (which may in any event constitute a criminal offence)*
- *Taking any photographs or videos which include any participant unless authorised by the appropriate source*
- *Coercing or guiding an individual in to anything, such as their views on the situation; they must be allowed to offer information on their own*
- *Promising confidentiality, but do explain the need for sharing their thoughts and who with*
- *Giving out personal information, or share email addresses, mobile phone numbers etc. with any Individual unless explicit permission is given*
- *Discussing referrals and concerns with any other individual outside the Safeguarding team, unless fully authorised by the DSL/DDSL*

I agree to comply with all the requirements of this Code of Conduct.

Name (please print in block capitals):

Signature:

Date:

Notes

Please retain a copy of this form for your own records before sending this to the Centre Compliance Manager. It will be stored electronically on the secure Safeguarding server only. Yor details will not be shared with third parties

The Seven golden rules for sharing information (including personal information):

- 1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them.** The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework¹ to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.
- 2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child² and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why.** You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).
- 3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.** You need a lawful basis³ to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm⁴, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.
- 4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.** Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. Instead, find out who in your organisation/agency can provide advice about what information to share and with whom. This may be your manager/supervisor, the designated safeguarding children professional, the data protection/information governance lead (e.g., Data Protection Officer⁵), Caldicott Guardian, or relevant policy or legal team. If you work for a small charity or voluntary organisation, follow the NSPCC's safeguarding guidance.
- 5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.**

6. **Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services.** Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.
7. **Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.** When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

¹ Where processing or sharing personal data, you must follow [the Information Commissioner's Code of Practice for Data Sharing](#) which should be read alongside the [ICO's guide to GDPR](#)

² Engagement with a child where it is appropriate to be based on their level of assessed competency. See [Gillick competence and Fraser guidelines | NSPCC Learning](#)

³ [Lawful basis for processing | ICO](#)

⁴ See page 9 of this document for further advice on appropriate lawful basis or use the [Lawful basis interactive guidance tool | ICO](#).

⁵ [Data protection officers | ICO](#)

SAFEGUARDING AT SETA

Meet the Team



**Designated
Safeguarding Lead**

Pete Hurlstone
Ground Floor,
Staff Corridor



**Designated
Safeguarding Lead**

Tracy Simper
Safeguarding Office,
just off reception



Russ James
Ground floor,
Staff Corridor



Honor Hurlstone
Safeguarding Office,
just off reception



Tracey Peerless
Student Welfare Office
on the Mezzanine Floor



Lily Lavall
Work Based
Learning Team

How to get in contact



Visit the Safeguarding & Pastoral
Office just off reception



Use the student phone in
reception



07594 299517



safeguarding@seta-training.co.uk



To report any
safeguarding
concerns via the
***My Voice
Reporting Tool***