

Reference: HR034 Version: 6.0

TITLE: Safeguarding Policy

Authorised by:
Russell Prince
Chief Executive

Effective Date: 16/08/2022
Supersedes: 16/08/2021

Contents

1. INTRODUCTION

- 1.1 This policy has been developed to ensure that all adults in SETA are working together to safeguard and promote the welfare of learners and young people.
- 1.2 This policy describes the management systems and arrangements in place to create and maintain a safe learning environment for all our learners, young people and staff. It identifies actions that should be taken to redress any concerns about learner welfare.
- 1.3 The Chief Executive and the HR Director or, in their absence, the authorised member of staff has the ultimate responsibility for safeguarding and promoting the welfare of learners and young people.
- 1.4 Safeguarding and promoting the welfare of learners and young people goes beyond implementing basic learner protection procedures. It is an integral part of all activities and functions of SETA. This policy complements and supports other relevant policies.
- 1.5 We have a duty to safeguard and promote the welfare of their pupils and, in accordance with guidance set out in 'Keeping Children Safe in Education (2022update)', SETA will work in partnership with other organisations where appropriate to identify any concerns about learner welfare and take action to address them.

2. ETHOS

- 2.1 SETA aims to create and maintain a safe learning environment where all learners and vulnerable adults feel safe, secure and valued and know they will be listened to and taken seriously. SETA is committed to '[Every Child Matters](#)' and implements policies, practices and procedures which promote safeguarding and the emotional and physical wellbeing of learners, young people and staff.
- 2.2 The Continuum of Needs and Response and the Common Assessment Framework is embedded into everyday practice and procedures when responding to learners need. The learners have access to appropriate opportunities to support the development of the skills needed to help them stay safe and healthy, develop their self-esteem and understand the responsibilities of adult and working life.

3. THE CURRICULUM

- 3.1 All learners have access to an appropriate curriculum in engineering, differentiated to meet their needs.
- 3.2 Learners and young people are encouraged to express and discuss their ideas, thoughts and feelings through a variety of activities.
- 3.3 All learners will know that there are adults in the Academy whom they can approach in confidence if they are in difficulty or feeling worried and that their concerns will be taken seriously and treated with respect.

4. ATTENDANCE & EXCLUSIONS

- 4.1 In accordance with SETA's Induction Pack for those that attend the Academy, recorded via Timenet a biometric clocking system. SETA takes action to pursue and address all unauthorised absences in order to safeguard the welfare of learners and young people in the Academy.
- 4.2 SETA have a biometric clocking system that all staff and learners use. This produces a report that is remotely sent to employers and to internal staff regarding attendance and timekeeping. All learners and parents are encouraged to report absences via the answerphone where it will be recorded and passed to the relevant members of staff.
- 4.3 SETA implements the statutory requirements in terms of monitoring and reporting learners missing education and off-rolling and understand how important this practice is in safeguarding learners and young people.
- 4.4 The designated person will be informed when a fixed term or permanent exclusion is being discussed and any safeguarding issues will be considered.

5. KEEPING RECORDS

- 5.1.1 SETA will keep and maintain up to date information on learners on the register including where and with whom the learner is living, attainment, attendance, referrals to and support from other agencies and any other significant event in a learner's life.

6. ROLES AND RESPONSIBILITIES

6.1 The HR Director of SETA will ensure that:

- The policies and procedures adopted to safeguard and promote the welfare of learners are fully implemented and followed by all staff.
- Safe recruitment and selection of staff is practiced.
- A Designated Member of staff for learner protection is identified and receives appropriate on-going training, support and supervision.

- Sufficient time and resources are made available to enable the Designated Member of staff to discharge their responsibilities, including attending meetings, contributing to the assessment of learners and young people, supporting colleagues and delivering training as appropriate.
- All staff receive appropriate training which is updated every two years or sooner if required
- All staff are made aware of SETA's safeguarding policy and arrangements.
- All staff feel safe about raising concerns about poor or unsafe practice in regard to the safeguarding and welfare of the learners and young people and such concerns will be addressed sensitively and effectively.

6.2 The Board of Directors will ensure that:

- There is a senior member of SETA's Operations Board team who is designated to take lead responsibility for safeguarding within the Academy.
- SETA's safeguarding policy is reviewed annually and updated and SETA complies with local safeguarding procedures.
- SETA operates safe recruitment and selection practices including appropriate use of references and checks on new staff.
- Procedures are in place for dealing with allegations of abuse against members of staff.
- All staff who have regular contact with learners and young people receive appropriate training and is up-dated by refresher training every 2 years.

6.3 The Designated Operational Board Member for Learner Protection has a specific responsibility for championing the importance of safeguarding and promoting the welfare of learners and young people registered at SETA. The Designated Person will:

- Act as the first point of contact with regards to all safeguarding matters.
- Attend up-dated training every two years.
- Provide information on how SETA carries out its safeguarding duties as and when required
- Ensure that SETA's actions are in line with Safeguarding Procedures.
- Support staff to make effective referrals to the Learners and Families Service and any other agencies where there are concerns about the welfare of a learner.
- Keep copies of all referrals to Learners and Families Services and any other agencies related to safeguarding learners.
- Ensure that all staff and volunteers receive information on safeguarding policies and procedures from the point of induction.
- Ensure that any staff with specific responsibility for safeguarding learners receive more in depth training.
- Manage and keep secure SETA's safeguarding records.
- Ensure that all staff and volunteers understand and are aware of the reporting and recording procedures and are clear about what to do if they have a concern about a learner.
- Liaise with the HR Manager about any safeguarding issues.

- Ensure that the Safeguarding Policy is reviewed annually or sooner if changes warrant and up-dated.
- Keep up to date with changes in local policy and procedures and are aware of any guidance concerning Safeguarding.
- Send a learners learner protection or safeguarding file separately from the main file to a new establishment if a learner leaves SETA. Keep a copy of the file.

7. PROMOTION AND ENGAGEMENT OF OUR POLICY

7.1 To learners, prospective learners and other members of the public

- SETA's commitment to safeguarding will be promoted via brochures, on the website and intranet.
- A summary of the results of monitoring information will be included in the annual report where this does not contravene confidentiality.
- A summary of the policy (position statement) shall be included in learner information packs, which are given to all learners at induction.
- Summaries of the policy will be displayed in appropriate public areas around SETA.
- The induction programme for learners will include the SETA's commitment to safeguarding.
- All learners undertake periodic on-line courses for Safeguarding. This is reinforced via on-line training throughout the apprenticeship.
- Tutors will all reinforce this information during tutorials and/or placement visits.
- If the policy requires amendment, this will be communicated to all employers via email and the OneFile e-portfolio system.

To staff

- A copy of the policy will be included on the staff intranet.
- The staff induction will include an overview of SETA's commitment to safeguarding. It will also outline procedures with regard to reporting cases of safeguarding
- If the policy requires amendment, this will be communicated to all staff via email.
- Safeguarding is an agenda item for all meetings within SETA.

7.2 Employers

- SETA's commitment to safeguarding will be promoted via brochures, on the website and intranet.
- All employers will receive a summary of the policy and will signify their understanding and agreement to these responsibilities via the Commitment Statement.
- Staff visiting learners on placement in companies will reinforce via the review system.
- If the policy requires amendment, this will be communicated to all employers via email and the OneFile e-portfolio system.

8. SAFE RECRUITMENT AND SELECTION OF STAFF

SETA's recruitment and selection policies and processes adhere to the guidance set out in Keeping children safe in Education 2022.(KCSIE).

9. WORKING WITH OTHER AGENCIES

SETA's has developed effective links with other relevant agencies and co-operates as required with any enquiries regarding learner protection issues. SETA will notify the District Team if:

- A learner subject to a learner protection plan is about to be excluded.
- There is an unexplained absence of a learner who is subject to a learner protection of more than two days from the academy
- Or as agreed as part of any learner protection plan or core group plan.

10. CONFIDENTIALITY AND INFORMATION SHARING

- Staff ensure that confidentiality protocols are followed and information is shared appropriately. The Director or Designated Member of Staff discloses any information about a learner to other members of staff on a need to know basis only.
- All staff and volunteers must understand that they have a professional responsibility to share information with other agencies in order to safeguard learners. All staff must be clear with learners that they cannot promise to keep secrets.

11. TRAINING AND INDUCTION FOR STAFF AND VOLUNTEERS

- Training is provided for all staff and volunteers from the point of induction. Induction training includes basic safeguarding information about SETA's policies and procedures, signs and symptoms of abuse (emotional and physical), how to manage a disclosure from a learner as well as when and how to record a concern about the welfare of a learner.
- All staff and volunteers who are in regular contact with learners receive basic Level 1 safeguarding training every 2 years and this is provided via online training. Staff with 'particular responsibilities' for safeguarding receive further training at Level 2 and above and this is accessed through the Stockport Safeguarding Board or from other appropriate providers (e.g., NSPCC).

12. RECORDING AND REPORTING CONCERNS

- All staff, volunteers and visitors have a responsibility to report any concerns about the welfare and safety of a learner and all such concerns must be taken seriously (Appendix A). If a concern arises all staff and visitors must:
- Speak to the Designated Person or the person who acts in their absence

- Agree with this person what action should be taken, by whom and when it will be reviewed
- Record the concern using SETA's safeguarding recording system

13. INFORMING PARENTS

- Our approach to working with parents is one of transparency and honesty and our responsibility is to safeguard and promote the welfare of all the learners whilst at SETA. In most cases parents will be informed when concerns are raised about the safety and welfare of their learner. Parents should be given the opportunity to address any concerns raised.
- Parents will be informed if a referral is to be made to the Learners and Families Service or any other agency.
- Parents will not be informed if it is believed that by doing so would put the learner at risk. In such cases the Designated Person or Director will seek advice from the Learners and Families Service's Initial Assessment Team.

14. FORCED MARRIAGE

- SETA is sensitive to differing family patterns and lifestyles that vary across different racial, ethnic and cultural groups. Forced marriage is a form of learner, adult and domestic abuse and, in line with statutory guidance, is treated as by SETA. Learner abuse cannot be condoned for religious or cultural reasons.
- If a case of forced marriage is suspected, the parents will not be approached or involved about a referral to any other agencies.

15. FGM

- FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for teachers

- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated Health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM *Appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information*

Tutors **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.

Unless the tutor has good reason not to, they should still consider and discuss any such case with the centres designated safeguarding lead (or a deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the tutor does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, tutors should follow local safeguarding procedures.

16. LEARNER PROTECTION CONFERENCES AND CORE GROUP MEETINGS (External)

- Members of staff are likely to be asked to attend a learner protection conference or other relevant core group meetings about an individual learner and will need to have as much relevant updated information about the learner as possible. A learner protection conference will be held if it is considered that the learner/learners are suffering or at risk of significant harm.
- All reports for a learner protection conference should be prepared in advance of the meeting and will include information about the learner's physical, emotional, intellectual development and well being as well as relevant family related issues.

17. PREVENT DUTY

- Prevent is about safeguarding individuals from being drawn into terrorism, ensuring those vulnerable to extremist and terrorist narratives are given appropriate advice and support at an early stage. Prevent is no different to any other form of safeguarding from harm. If a safeguarding issue arises please refer to the full Prevent Policy HR053

18. MANAGING ALLEGATIONS AND CONCERNS AGAINST STAFF

- SETA follows the procedures recommended by the Stockport Metropolitan council when dealing with allegations made against staff and volunteers.
- All allegations made against a member of staff, volunteers including contractors working on site, will be dealt with quickly and fairly and in a way that provides effective protection for the learner while at the same time providing support for the person against whom the allegation is made.

19.COMPLAINTS OR CONCERNS BY LEARNERS OR STAFF

- Any concern or expression of disconcert made by a learner will be listened to seriously and acted upon as quickly as possible to safeguard his or her welfare.
- We will make sure that the learner or adult who has expressed the concern or made the complaint will be informed not only about the action to be taken but also about the length of time required to resolve the complaint. We will endeavour to keep the learner or adult informed about the progress of the complaint/expression of concern.

19 SERIOUS CASE REVIEWS

- Any concern or expression of disconcert made by a learner will be listened to seriously and acted upon as quickly as possible to safeguard his or her welfare.
- The MASSH will always undertake a serious case review when a learner or young person dies (including death by suicide) and abuse or neglect is known or suspected to be a factor in their death. The purpose of the serious case review is to:
- Find out if there are any lessons to be learnt from the case about how local professionals and agencies work together to safeguard and promote the welfare of learners and young people.
- Identify what those lessons are, how they will be acted on and what is expected to change as a result of the serious case review.
- Improve working to better safeguard and promote the welfare of learners and young people.
- If required SETA will provide an individual management report for a serious case review and will cooperate fully with implementing outcomes of the review including reviewing policy, practice and procedures as required.

20. INSURANCE

SETA will ensure suitable and sufficient insurance cover is in place during the term of the learners' apprenticeship.

21. WORK EXPERIENCE

SETA will ensure placements do not infringe age and/or other legal good practice restrictions applying to young persons. Risks will be assessed, controlled and parents/carers will be informed.

22. OUT OF HOURS SAFEGUARDING

All learners are made aware of the Safeguarding Officers and their contact details on commencement of training. Safeguarding Officers are available 24 hours/seven days per week on a dedicated number: 07783 772324 and also on a separate email for the Safeguarding Lead only. **Further Information on Safeguarding and Safeguarding Policies can be found on Stockport Borough Council Website – 0161 217 6028 for reporting.**

Please see APPENDIX A - Part 1 “Keeping Children Safe in Education (2022)

Learner Protection Policy

AIMS

At SETA Training & Advisory Services we aim to promote the general progress and well-being of each pupil/learner. Because of day to day contact with pupils/learner, the Academy staff are particularly well placed to observe outward signs of abuse, changes in behaviour or failure to develop. SETA is required as part of the Local Learner Protection Procedures to report, when appropriate, their concerns to the social services department immediately.

GUIDELINES

It is important to note that all written notes/evidence should be kept separate from a learners files to which parents have access. These separate notes to be kept in a locked cabinet. Every concern must be followed up immediately.

1.0 ACTION – ABUSE: Physical Abuse, Emotional abuse and Neglect

- 1.1 Any member of staff (teaching or non-teaching) who becomes aware that a learner has been abused or is at risk of being abused should notify the designated member of staff immediately.
- 1.2 The designated member of staff shall:
 - i. together with the member of staff involved note the injury using a copy of the Incident Report Form contained in the guidelines and any explanation given by the learner for the injury.
 - ii. consider whether there is a need for emergency medical treatment.
 - iii. check the learner protection register.
 - iv. where possible enquire of the parent how the injury happened and note response.
- 1.3 In the light of the above information the designated member of staff **Mrs Julie Burns** should decide whether to refer the case to the Social Services Department for investigation or to monitor the learner against further risk.

1.4 If there is uncertainty, or it has not been possible to obtain information, e.g., where it has not been possible to see parents, the Social Services Department should be consulted for guidance as to how to proceed.

1.5 When a referral has been made to the Social Services department:

- i. Every co-operation should be given to the Social Workers in any arrangements they might wish to make for the learner, e.g., medical examination.

2.0 ACTION - SEXUAL ABUSE

2.1 Any member of staff (teaching or non-teaching) who becomes aware that a learner has been sexually abused or suspects that sexual abuse may have been committed should notify the designated member of staff immediately.

2.2 *Do not attempt to discuss with the learner or parent. The designated member of staff should refer the case immediately to the Social Services Department.*

Any further discussion with the learner and parents must be undertaken by social workers, police and medical staff who are trained in the investigation of sexual abuse. Inappropriate action by others may negate or 'contaminate' vital evidence.

2.3 A careful note should be made of the disclosure and/or signs giving rise to the suspicion that sexual abuse has taken place.

2.4 When a referral has been made:

- i. Every co-operation should be given to those in the investigation of the case.
- ii. A full report and the recommended pro-forma should be faxed immediately to the MASSH team along with a telephone call. This is good practice to find out which district the referral will go to. This report will be acknowledged and circulated to the Social Services Department, NSPCC and the Health Authority immediately.

3.0 DETACHED INSTRUCTORS AND STAFF

In situations where someone who is not a member of staff becomes aware, ***whilst working in the Academy***, that a learner has been abused or is at risk of being abused, they should notify SETA's designated member of staff who will be responsible for carrying through the learner protection procedures.

4.0 NOTE: LEARNERS WITH SPECIAL EDUCATIONAL NEEDS

"Indications of learner abuse concerning learners with special educational needs should be reported exactly as they would for other learners; but, since SETA's relationship with the family is especially important where a learner has special needs, subsequent dealings with and expectations of parents should be handled with care".

5.0 Disclosure Barring Service - DBS

SETA will ensure staff and volunteers who work directly with the learners have had a DBS check. Systems are in place to ensure learners are not working with unsuitable people. Prior to the learner starting at the placement company, good practice is given on learner protection and (although it is not compulsory with employers) DBS checks are carried out on staff. DBS checks will be carried out on all new members of delivery staff. Any existing staff will be renewed every 3 years unless given exceptional reason to obtain sooner.

6.0 Learner IT Usage

Learner IT usage is taken very seriously and a policy is in place to govern any usage on any equipment personal or otherwise. Please refer to the **HR007 IT/Internet Safety Policy**.

For RoATP purposes we have attached the above policy at the end of this document.

The named person for Learner Protection at SETA is
Mrs Julie Burns- Human Resource Director

Incident Report forms are available from the designated learner protection person.



1 INCIDENT REPORT FORM

DATE:

Learners Name:

Section/Company:

Referred by:

Incident being reported:

To whom:

Outcome / Action taken:**Agreed with SETA date:****Review Date:****Photographing Young Learners****Contents**

The majority of occasions when people take photographs of learners and young people are valid and do not provide any cause for concern.

Unfortunately there are occasions when this is not the case and these are some of the risks associated with photographing learners:

- The collection and passing on of images which may be misused
- The identification of individual learners to facilitate abuse
- The identification of learners in vulnerable circumstances

1. Consent and permission

The consent of parents/carers (and learners/young people of appropriate age) should be sought before any photographs are taken. An organisation may seek overall consent from its learners for photography; however the guidelines should be clear about the reason and purpose for that decision.

2. Reason and purpose

Photographs should only be taken by an authorised person who has a suitable reason related to the learner or organisation i.e. they are a parent, a relative or a member of staff.

Unless photographs are taken as part of working activities such they should be used for an individual purpose not a public purpose e.g. not posted on the internet and not passed on to others unconnected with the learner.

The centre photographs are legitimate and parents/carers should be asked permission or at least be aware that photographs are being taken at these events and that they may be displayed on SETA's notice boards, advertising brochures and the website. If permission is not granted, they should not be used.

3. Identification of subjects

Any photograph should not allow an unauthorised person to identify a learner or their whereabouts. So, if using a full name have no photograph, if using a photograph have no full name.

4. Photography for public display

You can decide whether you want publicity photographs and if so you should inform the press of your policies before they arrive. It is worth noting that it is not illegal to take photographs at a public event even if asked not to do so, but if your event is private then you can insist that your own policy is followed. Photographs of learners in activities should try to include a wide range of types of learners, and not show them in breach of rules, or behaving in a reckless or dangerous fashion. Images should never be stored in personal computers.

5. Use of Mobile phones

Mobile phones are easily used without the subject being aware and their main function is to transmit images to others not to be retained by an authorised person as a keepsake. Their use should be discouraged however the spread of this technology does make this difficult. This is something to be aware of when hosting any event. You may choose to ban the use of photograph mobile phones at your event but this is difficult to police.

The Legal Position – Data protection

- 1.1 The Data Protection Commission has advised that photographs constitute “personal data” and processing of such data is subject to the requirements of the 1998 The Data Protection Act 2018.
- 1.2 It is not necessary to rely on consent for taking or displaying photographs in most circumstances. Processing of personal data should satisfy the conditions in Schedule 2 of the Data Protection Act 2018, the most relevant for these purposes being that:

The processing is necessary for the purposes of legitimate interests pursued by the data controller or by the third party or parties to whom the data are disclosed, except where the processing is unwarranted in any particular case by reason of prejudice to the rights and freedoms or legitimate interests of the data subject.

- 1.3 However, a photograph constitutes “sensitive” personal data if it is possible to infer, for example, an individual’s religious beliefs from that photograph (i.e., First Communion photographs).
- 1.4 It is therefore recommended that explicit written consent is always obtained from the parent and learner where photographs are used, in order to comply with legal requirements laid out in Schedule 3 of the Data Protection Act 2018. This states that one of the required conditions for processing sensitive data is that the data subject has given his explicit consent to the processing of personal data.

Please note that separate consent is required if data is placed on a website

Looked After Learners

The photographing, video recording and filming of Looked after Learners taking part in family activities, school/workplace events and other occasions should be seen as a normal and essential part of their learning. However, where the intention is that these photographs are to be stored and or published special rules must apply where a learner is not living with their natural parents.

Parental consent is essential for all Looked after Learners. All requests for images to be taken or recorded of Looked after Learners should be referred to the Social Worker responsible for the learner in question.

Safeguarding Code of Conduct & Behaviour – for all staff

Contents

You must **not**:

- Staff **should not** spend excessive amounts of time alone with learners and vulnerable adults, away from others. Meetings with individual learners and vulnerable adults should be avoided or take place within sight of others. If privacy is needed, the door should remain open and other staff should be aware of the meeting.
- Staff are **advised not to** make unnecessary physical contact with learners and vulnerable adults. However, there may be occasions when physical contact is unavoidable, e.g. providing comfort at times of distress. In all such cases contact should only take place with the consent of the learner.
- It is **not good practice** to take learners and vulnerable adults alone in a car, however short the journey. Where this is unavoidable, it should be with the full knowledge and consent of the parents (or guardians)
- Staff **should not** meet learners and vulnerable adults outside of the work environment
- Staff **should not** start an investigation or question anyone after an allegation or concern has been raised. This is the job of the authorities. You should record the facts and report these to the Safeguarding Officer.

- Staff should **never** (even in fun) –
 - Initiate or engage in sexually provocative conversations or activity
 - Allow the use of inappropriate language to go unchallenged
 - Do things of a personal nature for learners and vulnerable adults that they can do themselves
 - Allow any allegations made by a learner or vulnerable adult go without being reported and addressed
 - Trivialise or exaggerate learner or vulnerable adult abuse issues
 - Make promises to keep any disclosure confidential from relevant authorities.

- Staff **should not** show favouritism to any one learner or vulnerable adult, nor should they issue or threaten any form of physical punishment.

You must:

- Staff **must respect** learners and vulnerable adults' rights to privacy and encourage learners and vulnerable adults to feel comfortable enough to report attitudes or behaviour they do not like

- Staff **will be expected** to act with discretion with regards to their personal relationships. They should ensure their personal relationships do not affect their leadership role within the organisation. All pre-existing relationships between staff and learners and vulnerable adults **must** be declared

- All staff **should be aware** of the procedures for reporting concerns or incidents, and should familiarise themselves with the contact details of the Safeguarding Officer

- If a member of staff finds himself or herself the subject of inappropriate affection or attention from a learner or vulnerable adult, **they should** make others aware of this.

- If a member of staff has any concerns relating to the welfare of a learner or vulnerable adult in their care, be it concerns about actions/behaviours of another staff member or concerns based on any conversation with the learner or vulnerable adult; particularly where the learner or vulnerable adult makes an allegation, they should report this to a Safeguarding Officer.

Procedure for responding to an allegation of learner abuse

This procedure must be followed whenever an **allegation** is made that a learner or vulnerable adult has been abused or when there is a **suspicion** that a learner or vulnerable adult has been abused.

Do not make promises regarding confidentiality. Explain to the person **at the outset** that you will need to report the disclosure and share the information with SETA's Safeguarding Officer. The Safeguarding Officer will, where possible respect the wishes of the individual;

however, information will be shared with external agencies where it is judged that a person is at risk of suffering significant harm.

The member of staff or learner who has concerns about possible abuse or neglect contacts their line manager and Safeguarding Officer as soon as possible for advice and support. A record of the incident or concern should be made on the Learner Protection/Vulnerable Adult Incident Report Form. If the complainant is the learner or vulnerable adult him/herself, questions should be kept to the minimum necessary to understand what is being alleged and leading questions should be avoided. The use of leading questions can cause problems for the subsequent investigation and court proceedings.

The Safeguarding Officer must report the matter to the MASSH team as a matter of urgency whether or not they feel this action is justified in the particular circumstances of the case. The matter will be reported over the telephone to the duty social worker (or such other person as required by the local Area Learner Protection Committee (ACPC) procedures). In the unlikely event that social services cannot be reached contact the relevant police learner protection team for the area.

A written record of the report will be retained by the Safeguarding Officer. The written record will note the date and time of the report and must include the name and position of the person to whom the matter is reported. The Safeguarding Officer should discuss with the MASSH team what action will be taken to inform the parents/guardian of the learner or vulnerable adult and a note of that conversation should be made.

Allegations against a member of staff including volunteers

In the event there is any suspicion, allegation or apparent abuse of a learner or vulnerable adult by a member of staff the matter should be reported to the DSL as soon as possible and the Chief Executive.

On being notified of any such matter the Safeguarding Officer and senior manager shall:

- take such steps as they consider necessary to ensure the safety of the learner or vulnerable adult in question
- liaise with the person who reported the original concern and ensure that a report of the matter is completed
- report the matter to the MASSH-Multi agency Safeguarding support Hub in accordance with the procedure set out above if not already done so
- notify SETA's Chief Executive

MASHH is a multi-agency safeguarding support hub who works with various agencies including Family and child social care, GM Police, Pennine care , Education welfare, Stockport homes and Stockport's LADO – Local authority Designated officer.

If the Safeguarding Officer is the subject of the allegation or complaint the matter must be reported direct to SETA's Chief Executive. If a complaint has been made against SETA Chief Executive the matter must be reported to the Chairman.

All staff should be aware of the fact that allegations may be made against them, and that the allegation may have grounds for substantiation or not. Any such notification may result in immediate suspension of the member of staff, and may result in the application of the company's disciplinary procedure where it is considered appropriate.

SETA's Safeguarding Team

Safeguarding Lead: Mrs Julie Burns jburns@setatraining.com 07783 772324

Deputy Safeguarding Officer: Louise Pollitt - lpollitt@setatraining.com

Chief Executive Mr Russell Prince – rprince@setatraining.com

Whistle Blowing/Confidential Reporting Policy**Contents****1. Introduction**

- 1.1 All of us at one time or another have concerns about what is happening at work. Usually these concerns are easily resolved. However, when they are about unlawful conduct, financial malpractice or dangers to the public or the environment or harassment or misbehaviour at work, it can be difficult to know what to do.
- 1.2 You may be worried about raising such issues or may want to keep the concerns to yourself, perhaps feeling it's none of your business or that it's only a suspicion. You may feel that raising the matter would be disloyal to colleagues, managers or to the organisation. You may decide to say something but find that you have spoken to the wrong person or raised the issue in the wrong way and are not sure what to do next.
- 1.3 SETA takes very seriously any form of malpractice and has introduced this procedure to enable you to raise your concerns about such malpractice at an early stage and in the right way. We would rather that you raised the matter when it is just a concern rather than wait for proof.
- 1.4 If something is troubling you, which you think we should know about or look into, please use this procedure. If you are aggrieved about your personal position, the Grievance Procedure, which is available from your manager or HR, is available to

you. However, this Whistle blowing/Confidential Reporting Procedure is also available for concerns about your personal position where you are uneasy about using the Grievance Procedure, as well as where the interests of others or of the organisation itself is at risk.

If in doubt – raise it!

2. SETA's assurances to you

Your safety

- 2.1 SETA and the Board of Directors are committed to this policy. If you raise a genuine concern under this Policy, **you will not** be at risk of losing your job or suffering any form of retribution as a result. Provided you are acting in good faith, it does not matter if you are mistaken. Of course we do not extend this assurance to someone who maliciously raises a matter they know is untrue.

Your confidence

- 2.2 SETA will not tolerate the harassment or victimisation of anyone raising a genuine concern. However, we recognise that you may nonetheless want to raise a concern in confidence under this Policy. If you ask us to protect your identity by keeping your confidence, we will not disclose it without your consent. If the situation arises where we are not able to resolve the concern without revealing your identity (for instance because your evidence is needed in court), we will discuss with you whether and how we can proceed.
- 2.3 Remember that if you do not tell us who you are, it will be much more difficult for us to look into the matter or to protect your position or to give you feedback. Accordingly, while we will consider anonymous reports, this Policy is not appropriate for concerns raised anonymously.

3 How we will handle the matter?

- 3.1 Once you have told us of your concern, we will look into it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation. We will tell you who is handling the matter, how you can contact him/her and whether your further assistance may be needed. If you request, we will write to you summarising your concern and setting out how we propose to handle it.
- 3.2 When you raise the concern you may be asked how you think the matter might best be resolved. If you do have any personal interest in the matter, we do ask that you tell us at the outset. If your concern falls more properly within the Grievance

Procedure we will tell you.

- 3.3 While the purpose of this Policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can. If requested, we will confirm our response to you in writing. However, we may not be able to tell you the precise action we've taken where this would infringe a duty of confidence owed by us to someone else.

4 How to raise a concern internally

- 4.1 If you have a concern about malpractice, we hope you will feel able to raise it first with your line manager. This may be done verbally or in writing.
- 4.2 If you feel unable to raise the matter with your Manager, for whatever reason, please raise the matter with the Director. Please say if you want to raise the matter in confidence so that they can make appropriate arrangements.
- 4.3 If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact: The Chair of the Board of Directors at board@setatraining.com

5 If you are dissatisfied

- 5.1 If you are unhappy with the response you get, remember you can go to the other levels and bodies detailed in this policy. Whilst we cannot guarantee that we will respond to all matters in the way that you might wish, we will try to handle the matter fairly and properly. By using this policy, you will help us to achieve this.

Seta has a legal requirement to make a referral to the DBS if a person in regulated activity has been dismissed due to a safeguarding concern or if they have resigned due to a safeguarding concern.