



Seetec

Safeguarding Policy

This policy relates to: Seetec Group UK Operations excluding SESI and IA

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1.0 Scope

This policy applies to the following colleagues employed by the following Companies within the Seetec Group;

- Seetec Business Technology Centre Ltd
- Seetec Outsource Training & Skills Ltd (trading division)
- Seetec Pluss and Pluss (Employability and Health)

This policy does not apply to the following Companies: (please refer to their specific policies, these are listed in Section 6):

- Interventions Alliance (trading division)
- Seetec Employment and Skills Ireland DAC

2.0 Introduction

Seetec is committed to and recognises its responsibility to safeguard the welfare of all children and adults it comes in to contact with, whether service users', learners, customers, associates or colleagues. Whilst we have a statutory obligation, we acknowledge our moral duty to ensure that as an organisation we function in a way that promotes safety and wellbeing. We expect that this is a shared value and embedded practice by all colleagues.

3.0 Policy Aims

The purpose of this policy and any subsequent Seetec (pillar specific) variances (see Appendices 1 and 2 for further reference) is to provide and outline a clear framework for protecting and safeguarding children and adults, so that all colleagues and those associated with the Seetec Group, can with guidance, support anyone they suspect may be experiencing suffering or who may be at risk of harm. It also applies to anyone working on behalf of Seetec or who supports sector or training specific operations.

Our policy aligns itself to the necessary compliance of the UK Government's Prevent strategy in England, and the governments Prevent Strategy. We are committed to promoting British Values, part of the governments counter terrorism strategy – CONTEST and further information on this is detailed in pillar specific Prevent procedures.

Seetec believes that all individuals have an equal right to protection from abuse, regardless of their age, gender, race religion, ability, sexual identify or language and consider the welfare and wellbeing of the individual as paramount. We also believe it is the responsibility of all colleagues to understand and know how to support any concerns observed or raised whilst fulfilling the duties of their role.

We will, therefore, take every reasonable step to ensure that children and adults are protected and safeguarded.

We will do this by:

- Valuing individuals, listening to them and respecting them
- Providing a safe environment for children and adults to learn in
- Identifying individuals who are suffering or likely to suffer significant harm and report concerns swiftly to the relevant agencies
- Working in partnership with other relevant agencies to support multiagency safeguarding work and share information where necessary to do so

- Responding effectively and in a timely manner to any circumstances giving grounds for concern or where formal complaints or expressions of anxiety are relayed
- Providing safeguarding training to all employees to ensure they are aware of their responsibilities and are knowledgeable of the types and signs of abuse
- Supporting employer partners to understand their obligations and promote a safe working environment
- Ensuring strict safer recruitment practices, exercising due diligence with all employment checks
- Regularly monitoring and evaluating how our policies, procedures and practices are working to safeguard children and adults
- Reviewing our policies and procedures at least annually.

We will achieve this through:

- Fostering strength and independence of individuals through relationship building, developing confidence, trust and security
- Raising awareness amongst colleagues – more specifically those in front facing roles or who are representing Seetec with service users - of their responsibility to recognise, respond and report safeguarding and/or welfare concerns where a child or adult may be at risk of harm
- Providing a robust system and process of recording and monitoring those known or thought to be at risk of harm or vulnerable
- Promoting the necessity for solid communication between colleagues from Seetec, our service users and partner employers
- Developing and ensuring effective working relationships with external agencies to include Local Child or Adult Services and Safeguarding Boards, CQC, education bodies (Ofsted (England), the Police (PSNI), our commissioning groups and where applicable, consulting with other external agencies such as Channel Coordinators for Prevent within the United Kingdom.

4.0 Policy Statement

Safeguarding Children – Statutory guidance Working Together to Safeguard Children (2018) defines safeguarding and promoting children’s welfare as:

- **Protecting** children from maltreatment
- **Preventing** impairment of children’s health or development
- **Ensuring** that children are growing up in circumstances consistent with the provisions of safe and effective care
- **Taking action** to enable all children to have the best outcomes.

A child is defined as anyone who has not reached their 18th birthday and may be considered at risk and therefore a safeguarding concern due to any number of factors. Seetec recognises the legislative dialogue surrounding the need for intervention.

Safeguarding adults involves the protection of an adults right to live safely, free from abuse and neglect. The Care Act 2014 places specific safeguarding duties to an adult who:

- Has needs for care and support (whether the local authority is meeting any of those needs or not)
- Is experiencing, or is at risk of abuse or neglect
- As a result of those care and support needs is unable to protect themselves from either the risk of abuse or experiencing abuse or neglect.

An adult with care and support needs may be:

- An older person
- A person with a learning or physical difficulty or disability
- Someone with mental health needs and experiences
- Someone with a long-term health condition
- A person who misuses substances or alcohol to the extent that it affects their ability to manage day to day living.

The main elements to our Safeguarding Policy are therefore focused on:

- **Prevention** (e.g., positive atmosphere, support for service users' safer recruitment procedures)
- **Protection** (by all following agreed procedures and pathways for referral, ensuring our employees are trained and confident in responding appropriately and sensitively to safeguarding concerns)
- **Support and Empowerment** (to service users and our employees who may have experienced or be experiencing significant harm) encouraging people to make their own decisions and give informed consent
- **Partnership Working** directly with our communities, parents/carers and external agencies where necessary (to ensure appropriate communications and actions are undertaken)
- **Accountability** being transparent in our delivery of safeguarding for children and adults alike.

We regularly develop and support the knowledge of our colleagues, to recognise that abuse can take many forms and may include, but not be limited to:

- **Physical abuse** – such as smacking, slapping, pushing, misuse of medication, restraint, hair pulling
- **Physical harm** – which may also be caused by a parent or carer who deliberately causes ill health to a child whom they are looking after known more commonly as fabricated or induced illness
- **Inadvertent physical abuse** – arising from poor support or care e.g., bruising from poor moving and handling which is classified as neglect
- **Restraint** – using force or threatening to use force to make a person do something they are resisting, or where a person's freedom of movement is restricted
- **Sexual abuse** – Includes rape, indecent exposure, inappropriate looking or touching, sexual teasing or innuendo, harassment and subjection to sexual pornography or witnessing sexual acts
- **Domestic abuse** – violence or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality. It includes 'honour' based violence, stalking behaviours*, coercive control, emotional, sexual, financial, psychological and physical abuse
- **Psychological abuse** – emotional abuse, threats of harm or abandonment, humiliation deprivation of contact from others, verbal abuse, cyber bullying, blaming and controlling

- **Financial or material abuse** – coercion, theft, and fraud, possessions or benefits
- **Discriminatory abuse** – verbal abuse, unequal treatment, inappropriate use of language, slurs, treating a person in a way that is inappropriate to their age and /or culture background, deliberate exclusion
- **Organisational abuse** – neglect and poor care practice
- **Neglect and acts of omission** – failure to provide access to appropriate needs, care and support or educational services, ignoring medical, emotional or physical care needs
- **Self-neglect** – either unable or unwilling to provide adequate care for themselves, or obtain necessary care to meet their needs, declining essential support, victimisation
- **Criminalisation** - including that involving county lines exploitation
- **Grooming** – for the purpose of sexual, criminal or radicalisation intent
- **Homelessness**, displacement, asylum
- **Peer on Peer abuse** – children abusing each other.

Welfare is defined as a child or vulnerable adult in need of universal help from those already involved or from a single or multiple agency response.

5.0 Governing Legislation and Frameworks

Our provision of services complies with UK laws and legislation as detailed below:

UK including England
Care Act 2014
Children Act 2004 and subsequent amendments
Children and Families Act 2014
Children and Social Work Act 2017
Counter Terrorism & Security Act 2015
Criminal Justice Act 2003
Equality Act 2010
Education and Skills Act 2008
Every Child Matters: Change for Children 2009
General Data Protection Regulation (GDPR) and Data Protection Act 2018
Information sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers – HM GOV
Keeping Children Safe in Education 2021-22
Mental Capacity Act 2005
Modern Slavery Act 2015
Mandatory Reporting of FGM (Oct 2015) and the Children and Social Work Act 2017
Multi-agency public protection arrangements (MAPPA): Guidance 2021
Prevent Duty Guidance 2015 & subsequent update
Safeguarding Disabled Children: Practice Guide 2009
Special education Needs & Disability Code of Practice 2020
Sexual violence and sexual harassment between children in schools and colleagues
The Safeguarding Vulnerable Groups Act 2006 & Amendments
The Prevent duty in further education and skills providers (England/Wales & Scotland)
Working Together to Safeguard Children 2018
Scotland
Protecting Vulnerable Groups Scotland
Safeguarding Children Board
Revised Prevent Duty Guidance (April 2021) Scotland
Getting it Right for Every Child (GIRFEC)

6.0 Associated Documents

- Seetec Group: Anti-Bribery, Corruption and Fraud Policy
- Seetec Group: Code of Conduct Policy and Business Ethics Policy
- Seetec Group: Data Protection Framework
- Seetec Group: Whistleblowing Policy
- Seetec Group: Disciplinary Policy
- Seetec Group: Equality, Diversity and Inclusion Policy
- Seetec Group: Health & Safety Policy
- Seetec Group: Individual User Agreement
- Seetec Group: Modern Slavery Policy
- Seetec Group: Recruitment and Vetting Policy
- Seetec Group: Web Filtering Site Categorisation Policy
- Seetec Group: Employee Safeguarding Policy
- Seetec Group: SEND Policy (Special Educational Needs and Disability Policy)
- Seetec Group: PREVENT Procedure
- Interventions Alliance: Children's Safeguarding Policy
- Interventions Alliance: Adult Safeguarding Policy
- SOTS: Prevent Risk Assessment and Action Plan
- SOTS: Safeguarding Practice and Referral Guidance
- SOTS: Employers Guide to Safeguarding - **pending**
- SESI: Protecting Children & Adults Safeguarding Policy - Rep of Ireland
- SESI: Protecting Children & Safeguarding Adult Procedure
- Employability & Health: Safeguarding Adults and Children Policy
- Employability & Health: Safeguarding Reporting Form
- Employability & Health: Safeguarding Practice and Referral Guidance

7.0 Senior Leadership & Colleagues Responsibilities

- Seetec's CEO has the overarching accountability for the Group's safeguarding arrangements
- The Executive Director Justice / Chief Social Worker will hold the Safeguarding Board lead with strategic responsibility for safeguarding across the Group. They will also ensure any organisational blocks to meeting legislative requirements, this policy and compliance processes are reported to the Board to address
- Directors will ensure safeguarding roles within their functions of responsibility are assisted by the provision of sufficient time, funding, and support to fulfil our children's and adults safeguarding responsibilities effectively
- A member of the Senior Leadership Team will hold the Group policy and operational lead and must ensure policies are contemporary with legislative requirements and that processes across the Group are supporting swift and effective practices
- A Human Resources Manager is identified as a Safeguarding Lead to oversee the management of safeguarding allegations and the safer recruitment of employees
- All Line Managers, including area leads and Centre Managers are responsible for following through the relevant safeguarding procedures and ensuring their employees have the sufficient training and case management support
- Functional/pillar Directors will ensure service specific procedures are implemented and reviewed to satisfy compliance with this policy and our statutory obligations

- Colleague caseload review meetings will include reviewing of safeguarding practice to ensure every member reflects on the quality of their practice, receives appropriate support and attends the required training
- Designated Safeguarding Leads (DSL's), referred to herein as Single Points of Contact (SPOC) are listed below:

Designated Safeguarding Lead (DSL) & Group Single Point of Contact (SPOC)	Ellie MacCarter (Head of Service – Professional Standards and Development) Ellie.Woolford@interventionsalliance.com Tel:07955441788
Deputy Group DSL & SPOC, DSL & Prevent SPOC - Seetec Outsource	Gill Rughoobee (Head of Safeguarding & Learner Welfare) Gill.Rughoobee@seetecoutsource.co.uk Tel: 07732691683
Deputy DSL & Prevent SPOC - Seetec Outsource	Lloyd DeVal (Director Outsource) Lloyd.DeVal@seetecoutsource.co.uk Tel: 07843828363
DSL & SPOC - Seetec Pluss	Gill MacKenzie (Safeguarding Manager Employability & Health) Gill.mackenzie@pluss.org.uk Tel: 07760 786543
DSL & SPOC - Seetec Pluss	Katy Lewis (Operations Director Pluss) Katy.Lewis@pluss.org.uk Tel: 07955 441445
Prevent Lead (Interventions Alliance)	Cynthia Allen (Director of Rehabilitation Services) cynthia.allen@interventionsalliance.com Tel: 07955441834

The DSL/SPOC will lead on and take responsibility for operational safeguarding within the sector specific pillars (including online safeguarding) and will ensure that Seetec have safeguarding and welfare policies and procedures that are fit for purpose with all legislative practice upheld. They will report safeguarding incidents where relevant to Senior Leadership and ensure that all colleagues are aware of the processes, have access to information, advice and guidance and up to date training on matters relating to safeguarding.

8.0 Raising a Concern

Seetec operates robust procedures to enable colleagues and service users to raise a concern. There are pillar specific processes as detailed in section 5, 'Linked Policies and Procedures' or as detailed in Appendix 1 and 2. In the most part these will occur as a direct result of colleagues recognising and responding to a concern or potential issue; a direct disclosure from a service user, or from information brought to light within an employer setting.

9.0 Recording of Information and Sharing

- All safeguarding concerns, actions and decisions will be promptly recorded and saved securely. Where used this will be through the CPOMS system and where this is not in use, will include retaining a copy of the referral made together with any evidence of prompt intervention implemented and any agreed course of action, to protect a child or adult. This will be securely stored with limited access. Oversight of this will be held by the sector specific DSL/SPOC
- Any reported incidents relating to the Prevent duty or that make any reference to the risk of radicalisation or extremism will immediately be reported to the DSL/SPOC within their pillar who will be responsible for any Prevent related referrals or actions. This will also be reported to the pillar specific directors and Seetec Board
- Consideration will always be given about what information to share and the impact of disclosing information on the individual or any third party. Any information shared must be proportionate to the need and level of risk. It must also be accurate, relevant, and adequate to the purpose of sharing the information. Information sharing decisions will always be recorded and include the rationale to share what and with whom
- From the outset of identifying safeguarding concerns, we will be open and transparent with the individual about why, what, how and with whom information will, or could be shared and we will also seek their agreement to share information, unless it is unsafe or inappropriate to do so.
- All information will be shared in a timely manner to reduce the risk of harm, and in an appropriate and secure way
- Linked policies and procedures provide pillar specific guidance in relation to recording and sharing of information in the event of a safeguarding concern.

10.0 PREVENT

PREVENT is a key part of the Government's Counter Terrorist Strategy. Section 26 of the Counterterrorism and Security Act 2015 places a duty on certain bodies in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". Preventing radicalisation remains part of our commitment to keeping children, and adults safe. Seetec are committed to safeguarding children and adults from radicalisation, along with any other forms of harm.

We will seek to create resilience to risk of radicalisation and extreme narratives, for our learners and service users, through all teaching practice and all aspects of delivery across the Group and ensure this through our vision, values and rule; we will uphold British values of:

- Democracy
- The Rule of Law
- Individual Liberty
- Mutual Respect and Tolerance of Different Faiths, Beliefs and Lifestyles.

Colleagues within the Seetec group are required to demonstrate their understanding of the issues linked to radicalisation and that they can not only recognise the signs of vulnerability but know how to refer their concerns. To support this, all colleagues will undertake specific PREVENT training as part of their induction. This training will be reviewed and updated as required. Colleagues will also be required to undertake regular refresher training and any amendments/new learning will be cascaded to all colleagues by the DSL's.

11.0 Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the regional Police Counter-Terrorism Unit. It aims to:

- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity
- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals
- Provide early intervention to protect and divert people away from the risks they may face and therefore reduce any vulnerability
- Focus on providing support at an early stage where it is thought that the risks of radicalisation are high. It provides a mechanism for organisations to make referrals if they are concerned that an individual might be vulnerable to radicalisation
- An individual's participation in the programme is entirely voluntary at all stages.

Seetec colleagues are required to respond to preventing radicalisation on a day-to-day basis and all colleagues' conduct is required to be consistent with preventing radicalisation. We work with partners, including the local authority, police and probation, and make referrals where appropriate to agencies regarding concerns about radicalisation and embed learning for this subject area into our curriculum where teaching and learning occurs. Colleagues undertake training to support their knowledge and understanding of the referral process for Channel.

12.0 MAPPA

The 'Introduction to the MAPPA Guidance' details statutory responsibilities and legislation relevant to managing sexual and violent offenders. MAPPA requires criminal justice agencies and other bodies to work together in partnership to discharge responsibilities to ensure the public are protected in a coordinated manner. Seetec are committed to working closely with agencies in this area to support service users and ensure they are free from discrimination and have equal access to services. Information regarding our pillar specific application to this, can be found in Appendix 1.

13.0 Safeguarding SEND

We understand that children and adults with special educational needs and disabilities (SEND) may face additional safeguarding challenges due to increased vulnerabilities as a result of several factors. We will promote awareness amongst our colleagues to make certain our service users are supported and heard. Colleagues are also encouraged to recognise that service users with SEND can be disproportionately impacted where a safeguarding concern is present. Due to the sometimes complexity of needs, colleagues must be alert of the additional barriers that exist in relation to children or adults with a disability or difficulties when recognising the signs, symptoms and indicators of all aspects of abuse. Pillar specific procedures are also in place where children or adults are enrolled in Seetec training or learning programmes.

Additional barriers that may exist which colleagues might not be consciously aware of include:

- Over identifying with the child's/adult's parents / carers and being reluctant to accept that abuse or neglect is taking place
- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child or adults' disability without further explorations
- Not being able to understand the child or adult's preferred method of communication or learning needs
- A lack of knowledge about the child or adult, e.g., unfamiliarity with their usual behaviour or management mechanisms.

14.0 Safeguarding Asylum or Refugee Seeking Children and Adults at Risk

Seetec recognises that the communities we work with are becoming increasingly diverse. Where someone has become displaced from their own home and country and is seeking asylum or is has refugee status, the requirement for specific and targeted support increases. Evidentially, those seeking asylum or who have refugee status encounter greater barriers and are more likely to have suffered torture, cruel, inhuman or degrading treatment or punishment. Where there are safeguarding concerns relating to the care and welfare of any unaccompanied child, or vulnerable adult, including where modern slavery is suspected or has been identified, these will be addressed in line with the statutory provisions guidance and locally agreed protocols and processes and coordinated by the pillar DSL in the first instance, with the support of the area local authority.

15.0 Contextual Safeguarding

Contextual safeguarding centres around the exposure to harm that can occur, particularly in adolescence, beyond the remit of the family home. It considers the impact of environments such as parks, transport hubs, educational provisions and the exposure to harm that may be prevalent in and around such settings through relationships and connections, created with peers and other adults disconnected from their family setting, which have the capacity to be formed off and online. Seetec recognises guidance from the University of Bedfordshire that informs practice, and which highlights the need for the DSL and any other designated personnel where appropriate, to consider extra familial contexts and relationships when responding to concerns raised for children beyond their familial settings. Colleagues will receive training with a particular focus in this field to support and develop understanding in this area.

16.0 Safeguarding Allegations Against a Colleague

In rare incidences where an allegation has been made about the conduct of a colleague towards a child or an adult with care and/or support needs whilst carrying out their work, we will liaise with the relevant Local Authority Designated Officer (LADO). The LADO will be advised of all cases where it is alleged that a person who works with children or adults with care and/or support needs has –

- behaved in a way that has harmed, or may have harmed a child or adult
- possibly committed a criminal offence against, or related to, a child or adult
- behaved towards a child, children, or adults in a way that indicated that they may be unsuitable to work with children or adults
- an association with anyone who poses a risk to children or adults; or
- where there are any suspected domestic abuse concerns and children, or adults may be involved

In the first instance, the allegation/incident should be reported to the DSL and named HR representative who will follow the Disciplinary policy and procedures in addressing the matter. If an allegation is made against the DSL this should be referred immediately to the Executive Director/Chief Social Worker.

17.0 Safer Recruitment

The Seetec group has in place safer recruitment practices to ensure those recruited are the best candidates for the role and are suitable to work with children and adults with care and/or support needs.

Colleagues responsible for regulated activity will have criminal convictions checked at the point of appointment where relevant for the job role via the Enhanced DBS/Barred list Disclosure service or Disclosure Scotland. Seetec will also adhere to safer recruitment procedures to utilise sessional, volunteers and agency workers. This includes undertaking the appropriate level of vetting for those job roles and referencing and is detailed further in our Recruitment and Vetting Policy. Seetec will undertake its duty to report to the DBS where it has considered or taken the decision to terminate employment of a colleague due to harm intended or caused to another. Where colleagues or volunteers are working with the Job Centre Plus (Department of Work and Pensions funded) service users, additional checks may be undertaken to meet our contractual obligations.

18.0 Children on Seetec Premises

Site Risk Assessments are undertaken to ensure that when children between the ages of 15-18-years old are attending Seetec premises to ensure they are safe, supported and their presence is managed to minimise the risk of vulnerability.

Due to health and safety and wider safeguarding requirements children under the age of 16 years who are not participating within a programme should not be brought onto Seetec premises. This also includes the children of Seetec colleagues.

19.0 Document Control

This is the change history and sign off information


19.1 Version Control

Record of Amendment		
Version Number	Date of Issue	Detail of Change
V1.0	June 2022	This policy replaces the previous Safeguarding UK Operations policy: <ul style="list-style-type: none">Safeguarding Protecting Children & Safeguarding Adults – Seetec UK Operations excluding SESI & IA

19.2 Next Review Date

The next scheduled review of this document will be: June 2023

19.3 Document Authorised

Document Authorised	
Name and Position	Authorisation
Ellie MacCarter, Head of Service, Professional Standards and Development	Ellie MacCarter E-signed 2022-07-07 10:22AM GMT+1 ellie.maccarter@interventionsalliance.com 
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Appendix 1: Sector Specific Policy Extension - Seetec Pluss / Pluss

1.0 Purpose

Seetec is committed to providing a safe and secure environment for anyone engaged with our programmes, whether these take place face to face or online. For the purpose of this policy extension, service users will be referred to as 'participants'.

The purpose of this extended policy is to specifically support the Employability and Health pillar (Seetec Pluss / Pluss CIC) and to make certain that all participants are protected through the awareness, preventative and reactive actions of all Seetec Pluss / Pluss colleagues supporting programme delivery. The welfare of our participants is paramount, and colleagues will adhere to the overarching Safeguarding Policy when addressing any participant concerns whilst observing pillar specific direction detailed herein.

2.0 Safeguarding Structure

The safeguarding structure within Seetec Pluss / Pluss (Employability and Health pillar) is as follows:

- Senior Responsible Officer for Safeguarding: Operations Director, Pluss CIC
- Designated Safeguarding Lead: Safeguarding Manager
- Deputy Designated Safeguarding Lead
- 2 x Designated Persons (Senior Operational Managers)

3.0 Designated Persons

Supporting the wider infrastructure of Seetec Pluss / Pluss and more specifically the DSL, the appointed Designated Persons (DP's) are trained to support colleagues with their response to safeguarding and participant concerns. They further guide the delivery of this policy by:

- Attending appropriate training (in addition to training elements that are mandatory for all colleagues within the pillar) to effectively steer and embed positive outcomes and interventions for participants identified as being in need
- Attending regular DP meetings, where they will share positive experiences and intervention journeys to improve practice and drive culture
- Support front line colleagues understanding and engagement with all matters linked to safeguarding, Prevent and British Values
- Assist in promoting awareness of the correct procedure within the pillar for recording information and consent within a 24-hour time frame of becoming aware of a participant concern
- Gaining the commitment of and maintaining the support from our delivery partners to promote equality, welfare and safeguarding in the workplace and raising any concerns in line with procedures where this is not upheld.

4.0 Participant-Facing Colleagues & Safeguarding

We are committed to promoting awareness of participant safeguarding, welfare and the Prevent agenda throughout our employability and health programmes for children and adults.

We seek out additional development opportunities for all colleagues involved in the delivery of services to ensure that they can recognise the signs and symptoms of possible abuse and neglect and are aware of the relevant procedures for reporting, recording and referring.

We work closely and collaboratively with all sub-contractors to ensure that they have appropriate and effective safeguarding and prevent policies and procedures in place where necessary and these are audited annually by the DSL.

5.0 Reporting and Recording a Concern

Seetec Pluss / Pluss will follow the 5 Rs of safeguarding guidance when addressing concerns raised or that become evident amongst participants. Colleagues will be supported to:

Recognise a concern: Any issues or concerns, allegations or suspicions relating to safeguarding or participant welfare must be taken seriously and reported, including low level concerns. All issues will be logged via the Safeguarding Reporting Form, to be completed as per the instructions on the form and submitted only to the safeguardingemp@seetecpluss.co.uk inbox.

Respond to a concern: Colleagues will follow the procedural recommendations and flow chart, available through our document repository, which includes the appropriate course of action to follow when supporting the participant.

Recording a concern: Colleagues will record factual observations, with relevant times and dates, and, where appropriate, quote the words used in a disclosure, and ensure that it is clear that these are the words actually used by the person disclosing the concern: they will be mindful not to offer their interpretation or impart their opinion, recognising that this may bias information provided and jeopardise any future investigation into the concern. Colleagues are encouraged to discuss any concerns presented with a Designated Person (DP) or the DSL and where the concern is determined to be high level, may be required to be available to support any determined intervention. Line managers have a role to play in supporting the person who has been dealing with the concern: recognising that dealing with safeguarding concerns can be distressing, the line manager should conduct a debrief with the person reporting or the recipient of the disclosure.

Records are stored within the safeguarding inbox, with access being available only to the Safeguarding team.

Referrals: The DSL will take steps to refer where necessary, having regard to the requirements around consent.

All information is confidential and shared only with those who 'need to know'. Any information shared with agencies is done so under the guidance of the Local Safeguarding Board and Local Authority Designated Officer (LADO).

New colleagues are not given unsupervised access to participants until the return of a satisfactory DBS check. In exceptional circumstances, a Risk Assessment will be considered whilst pending, subject to other satisfactory pre-employment checks.

6.0 PREVENT & Channel

Further to Seetec's commitment to Prevent, we understand that we have a duty to cooperate with the Channel programme in the carrying out of its functions, as well as with the police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Recognition of vulnerability factors can include where a participant is experiencing:

An identity Crisis – the participant is distanced from their cultural / religious heritage and experiences discomfort about their place in society.

Personal Crisis – the participant may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.

Personal Circumstances – migration; local community tensions; and events affecting the participant's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.

Unmet Aspirations – the participant may have perceptions of injustice: a feeling of failure
Rejection - of civic life.

Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.

Special Educational Needs – participants may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

This list is not exhaustive, nor does it mean that all children or adults experiencing the above are at risk of radicalisation for the purposes of violent extremism.

Further critical risk factors could include:

- being in contact with extremist recruiters
- accessing violent extremist websites, especially those with a social networking element
- possessing or accessing violent extremist literature
- using extremist narratives and a global ideology to explain personal disadvantage
- justifying the use of violence to solve societal issues
- joining or seeking to join extremist organisations
- significant changes to appearance and / or behaviour
- experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis

7.0 MAPPA

We work with MAPPA participants, supporting them in their journey into work, in line with any restrictions that they may have, and any commissioner-specific requirements, which can be found in appropriate documentation for the relevant programme.

8.0 Online Safety

Seetec Pluss / Pluss recognises that the online world provides broad positive opportunities for information and communication; however, it can also present significant risks and challenges. Being alert to the risks online harm presents and aware of how to navigate these in order to protect oneself and enjoy the opportunities for growth is key, and we are committed to the provision of information and guidance in relation to online digital literacy to build resilience amongst participants.

Some risks to be aware of include:

On-line grooming - involving an adult collecting personal information from a child, building up their trust and confidence (often by pretending to be a child) and offering gifts to entice them into a relationship or action.

Cyber bullying – using an on-line platform and which can be done in a variety of ways e.g - by posting malicious content, spreading rumours on-line and making false statements about someone, often anonymously.

Sexting - this involves children taking and sending an indecent image of themselves or sharing them on-line or via a mobile phone. There are legal implications of sending an indecent image of a person under the age of 18 or a child being in possession of an indecent image of another child.

More detailed information pertaining to our processes for this can be found in our E-Safety document.

9.0 Monitoring and Review

The DSL and senior leadership team will be responsible for the periodic review and monitoring of the Safeguarding Policy and all other policies linked to Employability and Health to ensure the requirements of current legislation are being met.

Appendix 2: Sector Specific Policy Extension - Seetec Outsource Safeguarding & Learner Welfare Pluss & Pluss

1.0 Purpose:

Seetec Outsource is committed to providing a safe and secure place of learning for anyone engaged with our programmes and courses. For the purpose of this policy extension, service users will be referred to as learners.

The purpose of this extended policy is to specifically support the training and education pillar of Seetec Outsource and to make certain that all learners are protected through the awareness, preventative and reactive actions of all Seetec colleagues (or anyone else working on behalf of Seetec), that participates in regulated activity. The welfare of our learners is paramount, and colleagues will adhere to the overarching Safeguarding policy when addressing any learner concerns, whilst observing pillar specific direction detailed here in.

2.0 Designated Persons

Supporting the wider infrastructure of Seetec Outsource and more specifically the DSL, Seetec Outsource has several appointed Designated Persons (DP's) that are situated within the field-based teams across the regions, trained to support colleagues with their response to safeguarding and learner welfare concerns. They further guide the delivery of this policy by:

- attending additional bespoke training to effectively steer and embed positive outcomes and interventions for learners identified as being in need
- attending regular DP meetings, where they will share positive experiences and intervention journeys to improve practice and drive culture
- disseminating new learning and information or societal updates and legislative changes to their field teams in a timely and effective manner
- support front line colleagues understanding and engagement with all curriculum activity linked to safeguarding, prevent and British Values
- ensure the CPOMS recording platform is correctly used to record information and consent within a 24-hour time frame of becoming aware of a learner concern
- gaining the commitment of and maintaining the support from our employer partners to ensure equality, welfare and safeguarding in the workplace and raising any concerns in line with procedures where this is not upheld
- utilise the IAG with colleagues as a first response when matters arise

3.0 Learner Facing Colleagues & Safeguarding

We are committed to promoting awareness of learner safeguarding, welfare and the Prevent agenda throughout our training and learning programmes for children and adults.

We seek out additional development opportunities for all colleagues involved in the delivery of services to ensure that they can recognise the signs and symptoms of possible physical abuse, emotional abuse, sexual abuse and neglect and are aware of the local authority guidelines for making referrals.

We also seek out additional development opportunities for all colleagues involved in the delivery of services to ensure that they can recognise the signs of radicalisation and extremism working with national and regional partners and again, are aware of the local authority guidelines for making referrals.

We work closely and collaboratively with all sub-contractors and employers to ensure that they have appropriate and effective safeguarding and prevent policies and procedures in place where necessary and these are audited annually by the DSL.

4.0 Reporting and Recording a Concern (CPOMS)

Seetec Outsource will follow the 5 Rs of safeguarding guidance when addressing concerns raised or that become evident amongst learners. Colleagues involved in regulated activity directly or indirectly, will be supported to:

Recognise a concern: Any issues or concerns, allegations or suspicions relating to safeguarding or learner welfare must be taken seriously and **reported**, including low level concerns. **All** issues will be logged through the CPOMS confidential software as detailed below.

Respond to a concern: Colleagues will follow the procedural recommendations and flow chart, available through our document repository, when supporting the learner, which includes the appropriate course of action to follow.

Recording a concern: Concerns will be recorded using the CPOMS secure platform. Colleagues will only record observations and will be mindful not to offer their interpretation or impart their opinion, recognising that this may bias information provided and jeopardise any future investigation into the concern. Colleagues are encouraged to discuss any concerns presented with a Designated Person (DP) or the DSL and where the concern is determined to be high level, may be required to be available to support any determined intervention.

Records are only stored on the secure server software (CPOMS) and access to this is limited and only permitted where relevant or necessary. Access to this is determined only by the DSL.

Learners and colleagues can also email safeguarding@seetecoutsource.co.uk with any concerns they may have.

Referrals: The DSL will then take steps to refer where necessary. We will follow the procedures as set by the Local Safeguarding Board in relation to the delivery of services and designated roles and tasks in supporting the learner, family, and employer subsequent to any investigation deemed necessary.

All information is confidential and shared only with those who 'need to know'. Any information shared with agencies is done so under the guidance of the Local Safeguarding Board and Local Authority Designated Officer (LADO).

New colleagues and volunteers are not given unsupervised access to children until the return of a satisfactory DBS check. In exceptional circumstances, a Risk Assessment will be considered whilst pending, subject to other satisfactory pre-employment checks.

5.0 PREVENT & Channel

Further to Seetec's commitment to PREVENT, we understand that training providers have a duty to cooperate with the Channel programme in the carrying out of its functions, as well as with the police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Recognition of vulnerability factors can include where a learner is experiencing:

An identity Crisis – the learner is distanced from their cultural / religious heritage and experiences discomfort about their place in society.

Personal Crisis – the learner may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging

Personal Circumstances – migration; local community tensions; and events affecting the learner's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy

Unmet Aspirations – the learner may have perceptions of injustice: a feeling of failure

Rejection - of civic life

Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.

Special Educational Needs – learners may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

This list is not exhaustive, nor does it mean that all children or adults experiencing the above are at risk of radicalisation for the purposes of violent extremism.

Further critical risk factors could include:

- being in contact with extremist recruiters
- accessing violent extremist websites, especially those with a social networking element
- possessing or accessing violent extremist literature
- using extremist narratives and a global ideology to explain personal disadvantage
- justifying the use of violence to solve societal issues
- joining or seeking to join extremist organisations
- significant changes to appearance and / or behaviour
- experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

6.0 Apprenticeships, Traineeships and Study Programmes

Seetec will ensure that the necessary checks and workplace risk assessments are made for each site hosting learners and will liaise closely with employers to ensure that all learners are safeguarded and able to carry out their duties at work in a place of safety. Employers are actively encouraged to engage in the learners onboarding process and to remain committed to safeguarding them throughout the course of their learning journey. Where necessary, Seetec will provide advice and guidance to support employer practice and request appropriate interventions where a safeguarding or learner welfare concern is raised linked to the workplace. Where required Seetec will also request the appropriate DBS check and safeguarding training for colleagues, this will be detailed in our Risk Assessments as detailed above.

7.0 Online Safety

Seetec Outsource recognises that the online world provides broad positive opportunities for information and communication; however, it can also present significant risks and challenges. Being alert to the risks online harm presents and aware of how to navigate these in order to protect oneself and enjoy the opportunities for growth is key and we are committed to the development of educational online digital literacy to build resilience amongst learners.

Some risks to be aware of include:

On-line grooming - involving an adult collecting personal information from a child, building up their trust and confidence (often by pretending to be a child) and offering gifts to entice them into a relationship or action

Cyber bullying – using an on-line platform and which can be done in a variety of ways e.g. - by posting malicious content, spreading rumours on-line and making false statements about someone, often anonymously

Sexting - this involves children taking and sending an indecent image of themselves or sharing them on-line or via a mobile phone. There are legal implications of sending an indecent image of a person under the age of 18 or a child being in possession of an indecent image of another child.

To support such threats, learners will be encouraged to tell an appropriate adult about any concerns they have while using the internet and colleagues are trained to recognise and respond to any changes in behaviour which may indicate a problem. If there are any concerns or a learner discloses information, then the procedures for raising a concern will be followed.

Colleagues may occasionally use social media to engage with learners, and where this occurs, it is expected that colleagues will adhere to good practice guidance as detailed in separate policies. Colleagues must not under any circumstance use their personal email address or allow a minor access to their personal social media accounts. Colleagues are also required to always use their Seetec email address and/or social media accounts when communicating with learners.

8.0 Child on Child Sexual Violence and Harassment

KCSIE (2022) determines that “sexual violence and sexual harassment can occur between two or more children of any age and sex. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children.” A child is categorised as anyone up to the age of 18. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and Seetec aims to make clear to all that it will never be considered acceptable. Through training, we will teach our colleagues to understand that it should never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. We will robustly challenge any behaviour that could be considered to be demonstrating the aforementioned and ensure processes to ensure such behaviours are not considered “normal”.

9.0 Monitoring and Review

The DSL and senior leadership team will be responsible for the periodic review and monitoring of the Safeguarding Policy and all other policies linked to education and skills to ensure the requirements of current legislation are being met.

Appendix 3: Related Areas to Safeguarding, Information for Colleagues

1.0 Forced Marriage

1.1 The tradition of arranged marriages has operated successfully within many countries and communities. A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriage's the families of both spouses take a leading role in arranging the marriage but the choice whether to accept the arrangements remains with the individuals. In forced marriages at least one party does not consent to the marriage and some element of duress is involved. Forcing someone to marry in the UK is a criminal offence.

1.2 Most cases of forced marriage involve young women and girls aged between 13 and 30 years. However, there is increasing evidence to suggest that as many as 15% of victims are male. This includes heterosexual, as well as gay, bi and transsexual men.

2.0 Child Sexual Exploitation

2.1 Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur using technology without the child's immediate recognition; for example, being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain.

2.2 In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability (National Working Group for Sexually Exploited Children and Young People (NWG) 2008).

2.3 Sexual exploitation results in children and young people suffering harm and may be supported to recover whilst others may suffer serious life-long impairments which may, on occasion, lead to their death, for example through suicide or murder.

3.0 Female Genital Mutilation (FGM)

3.1 Female genital mutilation is a collective term for procedures which include the removal of part or all of the external female genitalia for cultural or other nontherapeutic reasons. This practice is not required by any major religion and medical evidence indicates that female genital mutilation causes harm to those who are subjected to it.

Girls may be circumcised or genitally mutilated illegally by doctors or traditional health workers in the UK or Ireland or sent abroad for the operation.

3.2 Female circumcision, excision or infibulation (FGM) is illegal in both Ireland and UK.

4.0 Modern Slavery / Trafficking

4.1 Modern Slavery includes exploitation in the sex industry, forced labour, domestic servitude in the home and forced criminal activity. These types of crimes are often called human trafficking. It can be perpetrated against men, women, and children, and include victims that have been brought from overseas, and vulnerable people in the UK and Ireland, being forced to work illegally against their will in many different sectors, including brothels, cannabis farms, nail bars and agriculture. Threats, use of force or other forms of coercion, abduction, abuse of power or position of vulnerability are just some of the way's perpetrators will force their victims to concede.

5.0 Honour Based Violence

5.1 'Honour' based violence is a crime committed when family members or acquaintances feel that dishonour (shame) has been brought to their family or community by doing something that is not in keeping with traditional beliefs of their culture. For example, having a relationship with someone from a different culture or religion, wearing clothes or taking part in activities that might not be considered traditional within their particular culture, or wanting to leave an arranged marriage or forced marriage.

6.0 Domestic Abuse

6.1 Domestic abuse is defined as an incident or pattern of incidents of controlling, coercive or threatening behaviours, violence or abuse by someone who is or has been an intimate partner or family member regardless of gender or sexuality. It includes 'honour' based violence, emotional, sexual, financial, psychological and physical abuse.

7.0 Stalking

7.1 Stalking can be defined as a pattern of repeated unwanted behaviour that causes an individual to feel distressed, scared, and / or fear violence. It differs from harassment, in that the perpetrator will be obsessed with, or fixated on, the individual they are targeting.

Such as repeatedly damaging property, watching or spying including tracking devices, contacting workplaces, colleagues, friends close to the victim, online monitoring, blackmail, making threats to hurt those close to the victim, including their children, repeatedly sending unwanted letters or gifts and sexual and physical assault.

8.0 Hate Crime

8.1 Hate crime or incidents means any incident that is perceived by the victim, or any other person, to be racist, homophobic, transphobic or due to a person's religion, beliefs, gender identity or disability. Anyone can be a victim of hate crime or incidents regardless of race, age, disability, sexuality or gender. Lesbian, gay, bisexual and transgender (LGBT) individuals could face additional concerns around homophobia and gender discrimination. Individuals may be concerned that they will not be taken seriously, recognised as a victim. Abusers may also control their victims by threatening to 'out' them to friends and family or support services.

Signature:



Email: ellie.maccarter@interventionsalliance.com

9.0 Gangs

9.1 A gang is defined as a relatively durable group who have collective identity and meet frequently. They are predominately street-based groups of young people who see themselves (and are seen by others) as discernible groups, engaging in criminal activity and violence which can be integral to the group's identity, laying claim over territory (this is not just geographical territory but also includes illegal economy) and in conflict with other similar gangs.

9.2 The risk posed to young people involved in gangs are being exposed to violence, weapons, drugs and sexual exploitation.

9.3 Evidence suggests that gangs are predominately male with an average age of 20 years. They have extensive criminal histories with the average age of the first conviction being at 15 years old. However, there is a reported increase in female members in gangs. There is often pressure for girls to associate with young boys in gangs to 'link' with gang members to attain status for their own protection and perhaps benefit from a criminal lifestyle. Sexual exploitation and abuse is a risk for girls. For example, rape by gang members as a form of retaliation or as an act of violence is said to occur quite frequently in some areas and reports to police are rare due to fear of intimidation.

10.0 Bullying

10.1 Whilst there is no legal definition of bullying it is often described as repeated behaviour which is intended to hurt someone either emotionally or physically and is often aimed at certain people because of their race, religion, gender or sexual orientation or any other aspect such as appearance or disability. It can happen anywhere, including schools, training centres, in public places and in the workplace. Bullying can take many forms including, name calling, damaging belongings, making things up to get someone into trouble, threats, intimidation, stealing money, posting insulting messages, or rumours on the internet etc.

11.0 Mate Crime

11.1 This term is understood to refer to the befriending of people who are perceived by perpetrators to be vulnerable, for the purpose of taking advantage of, exploiting and /or abusing them. The relationship is likely to be of some duration and, if left unchecked, may lead to a pattern of repeat and worsening abuse. Mate crimes are likely to happen in private, often in the victim's homes. It can also occur via social media, where victims are financially or sexually exploited after being befriended online. Whilst this crime can affect many people, individuals with learning disabilities, mental health, older people and those with substance abuse issues are all at greater risk.

12.0 Private Fostering

12.1 Private fostering is when a child under 16 (under the age of 18 if disabled) is cared for by someone who is not their parent or a *close relative. Private fostering is a private arrangement entered by a parent and another individual for a period of more than 28 days. It sits outside current statutory arrangements and prospective private foster carers are not vetted by children's social care agencies.

12.2 Legal Obligations: Privately fostered children are safeguarded by the Children Act associate regulations. It is an offence not to notify the local council of a private fostering arrangement. Professionals in the education, health and social care fields therefore have a shared responsibility to work together to ensure that all privately fostered children are well cared for and are safeguarded from harm.






Safeguarding Policy - Group excl SESI & IA v1 0722 final

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