



Safeguarding Policy

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Section 1: Definitions and Descriptions

1. Introduction

Genius People recognises that our management team, members of staff and learners have an important role to play in safeguarding the welfare of young people and vulnerable adults and preventing their abuse.

Our safeguarding standards and behaviours seek to underpin safeguarding in all our practice and are derived from section 11 of the Children Act (2004) and the Care Act (2014) as well as best practice guidance such as:

- 'Working Together to Safeguarding Children'
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- Keeping Children Safe in Education Sep 2019 (KCSiE)
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

All Genius People staff, associates, third-party providers, employers and volunteers have a duty of care to safeguard and promote the welfare of learners, both those that are employed (apprentices) and those who are non-employed. This includes employers safeguarding apprentices within their place of work.

Everyone working with learners, vulnerable adults and their families is asked to familiarise themselves with this policy to understand their role in reporting any safeguarding concern. This policy is available on our website.

2. What is Safeguarding?

Safeguarding is the protection of children and adults at risk from abuse and neglect, promoting health and development, ensuring safety and care, and ensuring optimum life chances.

The Safeguarding Agenda includes a wide range of potential risks such as:

- Abuse (physical, emotional, financial, institutional, sexual, and organisational)
- Self-neglect
- Discrimination
- Child sexual exploitation
- Bullying and cyberbullying
- Domestic abuse
- Substance misuse
- Fabricated and induced illness
- Faith abuse
- Forced marriage

- Gang and youth violence
- Female genital mutilation (FMG)
- Gender based violence
- Radicalisation
- Sexting
- Teenage Relationship abuse
- Trafficking and modern slavery
- Mental health concerns
- Peer to Peer Abuse
- E-Safety
- Incels
- County Lines
- Missing children in education

A Child is defined as anyone under the age of 18.

An adult at risk (previously vulnerable adult) is defined as any person over the age of 18 and at risk of abuse or neglect because of their need for support or personal circumstance. This could be due to, and not limited to, any of the following:

- Living in sheltered housing
- Receiving any form of health care
- Receiving a welfare service to support their needs
- Receiving a service due to their age or disability
- Living in residential accommodation as a care home
- Receiving domiciliary care in their own home
- Expectant or nursing mothers living in residential care
- Persons under supervision of the probation service

While the definitions of a child and adult at risk give the rationale for legislative intervention, it is important to note that a person may be deemed at higher risk of a safeguarding issue affecting them due to other factors, examples:

- Poor numeracy and literacy skill or specific learning need
- Unsupportive home environment
- English not the first language
- Unsupportive employer
- Underrepresented group
- Acting as a carer for another family member
- Background in offending
- Disability or social need

3. What is abuse?

Abuse can take many forms, but it is categorised under 4 main themes:

- Physical abuse
- Sexual abuse
- Emotional / psychological abuse
- Neglect

In addition to the above, vulnerable adults may also be subject to:

- Financial and material abuse
- Self-neglect.

4. What is Female Genital Mutilation?

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia for non-medical reasons. FGM a type of honour-based violence (HBV) is illegal in England and Wales under the FGM Act 2003. It is a form of child abuse and violence against women.

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

For the purposes of the duty, the relevant age is the girl's age at the time of the disclosure/identification of FGM (i.e. it does not apply where a woman aged 18 or over discloses she had FGM when she was under 18).

Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply. The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred. The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

5. What is forced marriage?

Forced marriage is an abuse of human rights, a form of violence against women and men, where it affects children, child abuse and where it affects those with disabilities abuse of vulnerable people.

A forced marriage is one in which one or both spouses do not (or, in the case of some adults with learning or physical disabilities or mental incapacity, cannot) consent to the marriage and violence, threats, or any other form of coercion is involved. Coercion may include emotional force, physical force or the threat of physical force, and, financial pressure. In an arranged marriage, both parties have consented to the union but can still refuse to marry if they choose to.

Forced marriage is child abuse, and employers are expected to pay due regard to the seriousness of breaches of the duty.

<https://www.gov.uk/guidance/forced-marriage>

6. What is grooming?

Grooming is a word to describe people befriending children and vulnerable adults to take advantage of them for sexual preferences. It is also used by extremist groups to radicalise individuals in to supporting and potentially committing terrorist attacks. It is generally associated with children; however, it does also affect vulnerable adults.

Sexual online grooming is when people form relationships with children pretending to be their friend, using social media platforms. The person carrying out the online grooming will try to establish the likelihood of the child telling someone. They will also find out as much as they can on the child's family and social networks. Online groomers will tend to use chatrooms used by young people.

Groomers will hide their true intentions and may spend a long time gaining a child or vulnerable adult's trust. They may pretend to be a child themselves, similar in age to the person they are grooming. They may also change their gender to make it easier to befriend the person they are grooming or try to gain the trust of the whole family to allow them to be left alone with a child or vulnerable adult. Groomers may deliberately try to work with children or vulnerable adults and gain the trust of their colleagues.

To gain trust, groomers will:

- Pretend to be someone they are not, for example saying they are the same age online
- Offer advice or understanding
- Buy gifts
- Give the child or vulnerable adult attention
- Use their professional position or reputation
- Take them on trips, outings or holidays

Children or vulnerable adults may not speak out about their situation because they:

- Feel ashamed
- Feel guilty
- Are unaware that they are being abused
- Believe they are in a relationship with a 'boyfriend' or 'girlfriend'.

7. What is cyberbullying?

Cyberbullying involves the use of electronic communication devices to bully people. These include mobile phones, tablets, iPods, laptops and PCs, Social media platforms such as Facebook, Instagram, Twitter and WhatsApp are used by cyberbullies to communicate.

Those most at risk are children using social media unsupervised, and vulnerable adults, as they may be more emotionally and mentally susceptible to the abuse.

8. What is upskirting?

Upskirting is when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

It's a criminal offence and is now listed in paragraph 27 of the new 2019 KCSiE guidance.

9. What is serious violent crime?

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school/college/work, a change in friendship or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children and vulnerable have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these.

Advice is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance: <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

10. What is contextualised safeguarding?

The term 'Contextual Safeguarding' highlights that young people experience harm beyond their families and recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

"Contextual Safeguarding, therefore, expands the objectives of child protection systems, beyond focusing on families in recognition that young people are vulnerable to abuse in a range of social contexts." (KCSiE).

Section 2: How will Genius fulfil its responsibilities for safeguarding?

11. Our responsibilities as an Employer

- To understand what is meant by safeguarding
- To promote the welfare of our learners
- To keep up to date with our statutory duties towards the welfare of children and vulnerable adults
- To create and maintain our reporting arrangements and guidance.

It is the responsibility of the employer to ensure employees collaborating with learners are free from convictions and of sound character and judgement and will not pose as any threat or danger to learners.

We ensure that arrangements for Safeguarding learners are appropriate and effective (Ofsted EIF July 2021). We have implemented measures to ensure that safeguarding policy and procedures are fully embedded into the learning journey, and we work closely with employers to ensure the most effective systems are in place.

Genius People ensures reflection on, and learning from, best practice in safeguarding through the Multi-agency Safeguarding hub (MASH). All Genius People Safeguarding policies are in accordance with, MASH arrangements and procedures.

This policy must be read and signed by all staff members and evidence of this kept on staff files and made available to learners/ parents (if appropriate).

12. Role responsibilities

Our directors

Our directors ensure we have effective policies, and these are implemented and followed. They are responsible for ensuring that sufficient time and resources are allocated to employees to carry out their responsibilities.

Our Designated Safeguarding Lead (DSL)

The DSL holds ultimate accountability for ensuring safeguarding arrangements for both learners including apprentices, staff and associates. They also ensure that safeguarding matters are central to the strategic management of Genius People. The DSL is an experienced and qualified practitioner whose role is to:

- To maintain links with Local Safeguarding Children's Boards, Multi Agency Safeguarding Hub and Prevent Coordinators, inform and advise all parties on legislation changes and current safeguarding themes, plan and implement training for all employees including CPD, quality assurance and standardisation for the designed safeguarding officer team

- Ensure that local delivery staff develop have knowledge of other agencies involved in safeguarding arrangements in order that they can effectively monitor the safety of the children and young people that Genius People works with
- To carry out investigations, where appropriate, into welfare concerns reported and liaise with external bodies such as safeguarding boards where appropriate
- Support and escalation processes
- Overall management of safeguarding issues reporting to board on any issues that arise
- Review procedures and policies on a timely basis
- Maintain own CPD to ensure their role can be fulfilled competently
- To deal with employee concerns over learner's welfare, signpost and offer guidance
- Carry out investigations where appropriate into welfare concerns reported and liaise with external bodies such as safeguarding board where appropriate
- Maintain own Continuing Professional Development (CPD) to ensure their role can be fulfilled competently and seek guidance where appropriate

The Designated Safeguarding Lead job description is available to view in Appendix A.

Our Regional Trainers/Tutors

Our trainers/tutors are responsible for checking the safety and welfare with all learners at each visit/communication and ensure that learners complete all safety related learning activities within their programme.

They maintain their CPD to ensure that they are aware of the indicators that there may be a safeguarding issue and report in a timely and appropriate manner as outlined in this policy

Support Team

Be mindful of indicators that there may be a safeguarding issue, should you meet a learner or potential learner.

Genius is committed to training all staff to work within the local safeguarding procedures and operational safeguarding arrangements where possible as set out by Multi Agency Safeguarding Hubs (MASH). Our 3 safeguarding partners are:

- local authorities
- clinical commissioning group within the local area
- police within the local area.

There are detailed requirements for safer recruitment outlined in KCSiE. These include specific requirements for education settings include keeping a Single Central Record (single check register) of the staff recruited and the required checks (i.e., DBS) that have been completed. Please also refer to our Safer Recruitment Policy.

All staff require enhanced disclosure when working with under 18 s and vulnerable groups form part of our education offer.

All staff are expected to comply with any DBS check request and to have a good understanding of what constitutes a safeguarding or welfare concern and how to provide support, guidance and the channels for escalating a concern.

To assist staff in this, on-going training and awareness, as well as continuous information, advice and guidance are provided to help staff to feel confident in proactively promoting safeguarding and understanding their individual responsibilities.

13. Safer Recruitment and Selection

Genius People follows safer recruitment processes and best practice:

<https://learning.nspcc.org.uk/safeguarding-child-protection/safer-recruitment/>

We ensure that all appropriate measures are applied in relation to everyone who works in the Company e.g., volunteers and staff employed by contractors. Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining references satisfactory to the Company, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews, reference checks and undertaking Disclosure and Barring Service (DBS) checks. All staff are required to hold DBS or equivalent at the appropriate level.

Single Central Record

The Company maintains a single central record of all checks on Company staff and, where appropriate, governors, volunteers and other people who may come into routine contact with vulnerable learners through the course of their studies.

Genius will keep a single central record detailing the DBS checks carried out on staff. All new appointments to the Company workforce who have lived outside the UK are subject to additional checks as appropriate. Genius will confirm that supply/temporary staff have also undergone the necessary checks. Identity checks are carried out on all appointments to the workforce before an appointment is made.

14. Raising Awareness of Safeguarding Procedures:

It is important that all members of the company recognise the role they play in safeguarding. Safeguarding must be covered during induction for all people, whether they are learners, staff or employers used by the company for work experience purposes.

Learners

Within the induction programme learners will be made aware of:

- What constitutes abuse under Safeguarding
- The reporting procedures for self-referral or reporting suspected abuse of a friend or colleague
- To whom the referral should be made
- The responsibility each learner has for another.

Staff

Within the staff induction programme employees will be made aware of:

- The procedure for reporting issues associated with safeguarding
- The key company personnel to whom the report should be made
- The responsibility of members of staff under the Safeguarding Policy and Procedure
- All new staff will complete Child Protection and Vulnerable Adult Awareness training.

Employer Placements

Any employers will be given training on the Genius People Safeguarding Policy and Procedures prior to the learner embarking upon the experience or placement. The Genius team and employer must:

- Identify a key employee who will act as the main contact for the learner on experience or placement for the purposes of child protection
- Instruct that key employee on the company's Safeguarding policy and Procedures and identify who their key point of contact is within company for any referrals for suspected abuse under Safeguarding
- Sign a declaration that appropriate training has taken place and that the employee is fully aware of their responsibility and the reporting process (appropriate notes and procedures will be left with the employee for reference purposes).

Full details of procedures associated with Safeguarding Work Placements are in the appendices.

15. eSafety

Young people and adults can be vulnerable to exploitation or abuse through technology.

<https://www.gov.uk/government/publications/online-safety-in-schools-and-colleges-questions-from-the-governing-board>

<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

It is important that staff are alert to potential risks vulnerable people may be exposed to, and that steps have been taken to mitigate the risk of this occurring, with specific reference to:

Content e.g., exposure to age-inappropriate material, inaccurate or misleading information, socially unacceptable material (e.g., inciting violence, hate or intolerance) and illegal material (including images of child abuse)

Contact e.g., grooming using communication technologies leading to inappropriate behaviour or abuse

Commerce e.g., exposure to inappropriate advertising, online gambling, identity theft and financial scams

Culture e.g., bullying via websites, mobile phones or other communication technologies, or inappropriate downloading of copyright materials (i.e., music, films, images); exposure to inappropriate advertising, online gambling and financial scams

Social Media e.g., Twitter, Instagram, Facebook, and other social media sites can also include and be used for bullying, coercion and grooming and as a point of exposure for extremism, sexual misconduct and scamming (e.g., financial schemes).

Addressing these issues through training for staff and volunteers, and awareness raising with service users, or members of the community, will be undertaken by the Genius. If there is any indication that a vulnerable person is experiencing difficulties in this area (for instance if they are reported to be spending long periods of time using a PC on their own or if they appear unnecessarily defensive, secretive or anxious about their PC use), then this will be taken seriously.

To ensure the eSafety of vulnerable learners Genius prioritise for face-to-face education as necessary.

16. Allegations related to staff members

Allegations of a safeguarding nature may constitute one or all the below:

- A concern which may mean the employee is not suitable to practice with children, young people and vulnerable adults
- A concern which has led to the possible harm to a learner
- A safeguarding concern which may be criminal in its nature or intent.

Allegations against a staff member who is no longer teaching or employed by Genius People should be referred to the police. Historical allegations of abuse should also be referred to the police.

Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a tutor or other member of staff or volunteer in the organisation is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

Genius will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children/ vulnerable adults at the organisation or whether alternative arrangements can be put in place until the allegation or concern is resolved.

Any suspicion, allegation or actual abuse of a young person by a member of staff must be reported to the DSL as soon as possible and at least within two hours.

Individuals should be informed of concerns or allegations as soon as possible and explained the likely course of action unless there is an objection by the children's social care services or the police. The individual should be advised to contact their representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer.

Care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Where an allegation is made against a staff member, either employed or associate, the matter should be reported immediately to the Managing Director in line with this policy and KCSiE guidance. The Managing Director will inform the DSL and the incident will be dealt with under the Genius People Policy.

Allegations of abuse are serious. Where a claim of abuse made against a member of staff is not substantiated and is found to have been malicious in intent, this would be dealt with through the disciplinary procedure.

If you are concerned that another member of staff is acting in a way that may be unsuitable practice or may be causing harm to another person or even committing a criminal offence against another person, report this to your line manager or the DSL.

If you feel unable to raise the issue with Genius, or that your genuine concerns are not being addressed, other whistleblowing channels are open to you. Please see the Whistleblowing and Complaints policy.

17. Risk Assessment

Genius uses risk assessment to inform the planning of safeguarding activities. This takes place at several levels:

- Cross company risk register – explicit section on Safeguarding
- Staff safeguarding risk assessment – considering safeguarding measures to be put in place for various groups of staff
- Hazardous activity risk assessments – in line with the company health and safety policy
- Individual learner risk assessments – where the needs or circumstances of the individual dictate that completion of a risk assessment would be beneficial.

Risk assessments are reviewed and updated on a regular basis as needs demand and at least once every year. See the Health and Safety Policy for further detail.

Section 3: Processes for Staff

18. Why is safeguarding necessary for employed learners?

Providers of government funded training have a duty to safeguard their learners/apprentices, and to take steps that always ensure the safety of its learners (children under 18 or vulnerable adults). As part of that duty, we ensure employers and other stakeholders are aware of their commitment in safeguarding their staff and to ensure that learners are not exposed to threats or dangers.

19. What should I do to disclose a safeguarding incident?

Every staff member must ensure that disclosures are reported to the DSL immediately. In consultation with the staff member, the DSL will decide as to whether a referral is necessary.

All reported disclosures regardless of outcome must also be reported internally within Genius People through the completion of the 'Safeguarding Incident Form' (Appendix B) in conjunction with the written referral to the appropriate local authority safeguarding team.

The form has 3 parts:

- Part 1 outlines the basic details of the referral and part 2 the details of the incident being reported. Both part 1 and 2 must be completed at the same time following the disclosure.
- The form must then be anonymised by removing the person's personal details and password protected and sent by email to the DSL.

Part 3 of the form must be completed within 7 days after the submission of Parts 1 and 2 once the outcome of the referral is known and resubmitted as detailed above.

- Re-assure the learner that they have done the right thing
- Record what the learner said, quoting their own words where possible. Sign and date the record
- Inform our DSL as soon as possible and pass on the written record
- Maintain confidentiality and do not discuss what was said with others, other than the DSL or Director
- Listen without making judgements
- Stay calm
- Try not to ask questions, but if you must, make sure they are open-ended questions to clarify
- understanding and not to probe or investigate
- Don't give an opinion or offer advice
- Don't promise confidentiality - explain that you will need to talk to the DSL.

20. What should I do about suspected abuse?

It is important that vulnerable people are protected from any form of harm so all complaints, allegations or suspicions must be taken seriously.

The following procedure must be followed whenever an allegation is made that a person has been abused or when there is a suspicion that abuse may be taking place.

Keep questions to a minimum to understand what is being alleged and avoid leading questions. The use of leading questions can cause problems for the subsequent investigation and any court proceedings.

A full record should be made as soon as possible of the nature of the allegation and any other relevant information including:

- the date
- the time
- the place where the alleged abuse happened
- your name and the names of others present
- the name of the complainant and, where different, the name of the young person who has allegedly been abused
- the nature of the alleged abuse
- a description of any injuries observed
- an account of the allegation that should be signed and dated by the person completing the report.

Any suspicion, allegation or incident of abuse must be reported to the DSL as soon as possible. The DSL will notify the Directors of any allegation or incident as soon as is practicable, within a maximum of 24 hours of the disclosure.

The DSL shall maintain a copy of the records, any notes, memoranda or other correspondence dealing with the matter and any other relevant material. Copies of reports, notes etc. should be kept securely locked.

Note: Learning Difficulties and / or Disabilities: Some people with learning difficulties and / or disabilities may need different treatment to other persons e.g., in the way their physical/mental condition might mask possible abuse.

21. What are signs that a vulnerable adult is being groomed online?

Some indicators to look out for when working with vulnerable adults are:

- Wanting to spend more and more time on the internet
- Being secretive about who they are talking to online and what sites they visit
- Switching screens when you come near the computer
- Possessing items – electronic devices or phones – you haven't given them
- Using sexual language, you wouldn't expect them to know
- Becoming emotionally volatile.

22. How do I keep myself and my learners safe?

To maintain your own, and your learners' safety, the following are strictly prohibited:

- Befriending learners on personal social media sites
- Distributing personal telephone numbers
- Visit learners at home
- Do not use sarcasm, insults or belittling comments towards learners
- Personal relationships with learners.

You will naturally build a rapport with learners/apprentices so will need to take care to maintain professional boundaries whenever carrying out work on Genius People's behalf. Be respectful and appreciate that you are in a position of trust.

Uphold confidentiality within certain remits when required by the situation but be careful not to promise to keep secrets or ask others to do so.

Online safety

You need to be aware of the nature of the possible threats that you and our learners could encounter whilst engaging in activity through the Internet.

These could be security threats, protecting and managing your personal data, online reputation management, and avoiding harmful or illegal content. These might manifest as online abuse, bullying, threats, impersonation, grooming, harassment or exposure to offensive and/or violent content.

We currently educate our learners about online dangers to ensure that they are aware of the risks. We cover E-safety within our programmes and periodically our Safeguarding newsletters cover online safety topics.

To ensure we monitor and act upon accessing of inappropriate content and comments, filtering systems are in place.

Peer-on-peer abuse

As a result of Ofsted's review into sexual abuse in schools, additional training for learner facing employees has taken place related to identify incidents of this nature including presence of accepted norms and the need to change this, and making learners aware of what constitutes sexual harassment and abuse both face to face in the workplace, and online.

Keep yourself up-to-date by undertaking recommended CPD and reading the awareness newsletters.

Mental health

The increased importance of supporting poor mental health has been seen through the increased prevalence of mental health concerns raised by learners both as the sole issue and also as an associated issue as a result of experiencing another safeguarding issue.

Encourage your learners to seek support from their employers, who have robust support networks in place, e.g., an employee assistance programme.

23. What data protections and confidentiality issues should I consider?

All staff/ stakeholders will be made aware of the confidentiality of any allegations made.

It is extremely important that when an allegation is made, the organisation make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against tutors whilst investigations are ongoing as set out in section 141F of the Education Act 2002 (see paragraphs 213-214). If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

In deciding what information to disclose, you should give careful consideration to the provisions of the Data Protection Act 2018, the law of confidence and, where relevant, the Human Rights Act 1998.

- Be clear
- Ensure you include the key details of the learner and any required description about them in the account
- Be accurate
- Be concise
- Record only relevant information to this report. Ensure that you are clear what is a fact and what is your opinion
- You may need to offer some analysis – in this circumstance you need to be clear about why you are worried? What is the likelihood and possible impact should the risk occur?

24. What happens to the recording of the disclosure and other information gathered?

Apart from forming the basis for the referral, it may also be used in court reports (civil and criminal) and in statutory safeguarding processes such as investigation and assessments and child protection conferences. Internally, the Genius People reporting process includes the requirement of an update on the Appendix B within 7 days of the disclosure which includes review of best practice. Please also see Data Protection policy for further detail.

25. How should I report honour based violence?

Reports under the duty should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day, unless any of the factors described below are present. You should act with at least the same urgency as is required by your local safeguarding processes.

If you think you are dealing with such a case, it is a mandatory requirement to inform your DSL as soon as practicable.

It is recommended that you make a report orally by calling 101, the single non-emergency number. You should be prepared to provide the call handler to explain that you are making a report under the FGM mandatory reporting duty and provide the following information-

- Your details: Name, contact details (work telephone number and e-mail address) and times when you will be available to be called back, job role, place of work
- Details of your organisation's designated safeguarding lead: name, contact details (work telephone number and e-mail address), place of work
- The girl's details: name, age/date of birth, address

Throughout the process, you should ensure that you keep a comprehensive record of any discussions held and subsequent decisions made, in line with standard safeguarding practice. This will include the circumstances surrounding the initial identification or disclosure of FGM, details of any safeguarding actions which were taken, and when and how you reported the case to the police (including the case reference number). You should also ensure that your organisation's designated safeguarding lead is kept updated as appropriate.

In line with safeguarding best practice, you should contact the girl and/or her parents or guardians as appropriate to explain the report, why it is being made, and what it means.

Wherever possible, you should have this discussion in advance of/in parallel to the report being made. However, if you believe that telling the child/parents about the report may result in a risk of serious harm to the child or anyone else, or of the family fleeing the country, you should not discuss it.

26. What should I do if a learner reports workplace safeguarding issues to me?

Advise the learner to follow in house reporting or whistle blowing procedures. You may support the learner in speaking to the appropriate senior team members.

Report the incident to your DSL who will offer additional guidance and signposting for the learner, and also monitor the situation.

It is important you do not pass any information to other parties or try to investigate the concern yourself.

If you require an immediate response call the Designated Safeguarding Lead immediately, it is noted that they may not be available out of normal working hours, so in circumstances where the individual is in immediate danger report the incident to the police on 999

The Designated Safeguarding Lead will endeavour to make initial contact regarding the concern with 72 hours.

The Designated Safeguarding Lead will assess if the individual is at risk of significant harm and decide upon the next course of action, this can range from offering signposting to support agencies to referral to the police and local safeguarding authorities. This may also involve passing information to the DBS.

If you feel the safeguarding concern reported is not being dealt with effectively by the safeguarding team then please refer to the Designated Safeguarding Lead or follow the whistleblowing policy.

If you disagree with the outcome of a safeguarding referral then please refer to the Designated Safeguarding Lead for guidance or you may also follow the local safeguarding board escalation procedure – found on their local authority website.

27. Genius Team Contacts

Position	Name	Contact Details	Address
Lead Designated Officer	Judith Jackson	jjackson@geniuspeople.co.uk 07464 497 773 0141 280 0265	1439 Cumbernauld Road Glasgow G33 1AN
Additional Designated Officer	Jennifer McEwan	jmcewan@geniuspeople.co.uk 07876 578 281 0141 280 0265	1439 Cumbernauld Road Glasgow G33 1AN

28. Associated Policies

Equality and Diversity Policy

Grievance Policy

Disciplinary Policy

Social Networking and media policy

Prevent Policy

Recruitment Policy

Bribery Policy

Anti-Slavery Policy

Policy Document Owner: Judith Jackson

Senior Manager Jennifer McEwan (Director)

Signed:

Date:

Appendix A: Designated Safeguarding Lead Job Description

The designated safeguarding lead should take lead responsibility for safeguarding and child protection including 'at risk' adults.

The DSL will have the appropriate status and authority within the company to carry out the duties of the post.

They will be given the time, funding, training, resources and support to provide advice and support to other staff on child/ 'at risk' adult welfare and child/ 'at risk' protection matters.

Whilst the activities of the designated safeguarding lead can be delegated to the deputy, the ultimate lead responsibility remains with the designated safeguarding lead; this lead responsibility will not be delegated.

Key areas of responsibility:

- Takes part in strategy discussions and interagency meetings
- Support other staff in information, advice and guidance including annual refresher training
- Complete a monthly Safeguarding Progress report
- Ensure Incident Report forms are password protected, completed timely in line with policy and that part 3 (follow up) is completed within 7 days
- Contribute to the assessment of children and 'at risk' adults
- Liaise with the appointed deputy designated safeguarding lead who will be trained to the same standard as the designated safeguarding lead
- Refer cases of suspected abuse to the local authority children's or adult social care as required
- Be the point of contact to monitor and give advice on lone working
- Support staff who make referrals to local authority children's and adult social care
- Refer cases to the Channel programme where there is a radicalisation concern as required
- Support staff who make referrals to the Channel programme
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Refer cases where a crime may have been committed to the Police as required
- To liaise with the senior leadership team to ensure contracts are compliant with ESFA funding guidelines and that policies and processes are effective.
- Liaise with the "case manager" and the designated officer(s) at the local authority for child or 'at risk' adult protection concerns (all cases which concern a staff member)
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies
- Act as a source of support, advice and expertise for staff

- Undergo training to provide them, and the deputy DSL with the knowledge and skills required to carry out the role- this training should be updated at least every 2 years
- Undertake Prevent awareness training and ensure all staff are safeguarding and Prevent compliant. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments
- Are able to keep detailed, accurate, secure written records of concerns and referrals and use the required policy and procedures to ensure best practice
- Review safeguarding Policy and Procedures including Prevent annually and ensure clear guidelines and information is cascaded to the team
- Ensure all staff, read and understand key update including KCSiE 2019 and sign to say they have read this ensure all policies and procedures are followed
- In exceptional circumstances arrange adequate and appropriate cover arrangements for any out of hours support
- And any other duties as is reasonable

APPENDIX B SAFEGUARDING INCIDENT FORM

Your details

Name:

Phone number:

Email:

Position / relation to child:

Address:

Contact details for welfare officer

Name:

Phone number:

Email:

Child details

Name:

Date of Birth:

Sex:

M

F

Other relevant information about the child: (e.g. mental and physical health, or any other contextual information)

Parent/guardian/carer details

Name:

Have the child's parent(s)/Guardian(s)/Carer(s) been informed of the incident?

Y

N

Email:

Additional Information:

Details of the concerns/allegations

Are you reporting concerns raised by: Yourself Someone else

If reporting concerns raised by someone else, please provide additional information.

Name:	Position/ Related to child
<input type="text"/>	<input type="text"/>
Phone Number:	Address:
<input type="text"/>	<input type="text"/>
Email:	<input type="text"/>
<input type="text"/>	

Date and time of incident:

Date and time of allegation:

Actions taken to date: (please give details of who else has been informed, including parents where appropriate, and any relevant contact details)

Details of the incident or concern

Details of the concern: (be clear which details are fact and which are speculation. Remember to record any injuries)

Details of who was involved: (include any witnesses and any people who are allegedly involved in the abuse/harm)

What the child said, if applicable (remember to use their exact words)

Signed:

Date: