



GENIUS JUNCTION

# Genius Junction Safeguarding Policy

<b>Section</b>	<b>Content</b>	<b>Page No.</b>
1.	Policy Aim and Objectives	3/4
2.	Understanding Safeguarding 2.1 How do we Define Children, Young People and Adults 2.2 Safeguarding Adults at Risk 2.3 Definitions and Types of Abuse and Neglect 2.4 Signs and Indicators of Possible Abuse 2.5 Prevent and Safeguarding 2.6 Sexting 2.7 Child Sexual Exploitation 2.8 Child on Child Abuse 2.9 Honor Based Violence 2.10 Female Genital Mutilation (FGM) 2.11 Forced Marriage 2.12 Knife Crime 2.13 Human Trafficking 2.14 Modern Slavery	5-13
3.	Safeguarding Structure and Responsibilities 3.1 Safer Recruitment	13/15 15/16
4.	Reporting 4.1 Procedures for Reporting Cases of Suspected Abuse Involving Children, Young People and Adults 4.2 Complaints and Allegations against Staff and Volunteers 4.3 The Role of the Designated Safeguarding Team 4.4 Reporting of low-level concerns 4.5 Martyn's Law	16/17 17/18 18 18 19
5.	Designated Persons Responsible for Safeguarding - Contacts	19/20
6.	Safeguarding Incident Record	20
7.	Related Policies	20

8.	Document Review	21/22
----	-----------------	-------

## 1. Policy Aim and Objective

**NB For the purposes of this Policy, the use of the term ‘people’ refers to all children, young people, vulnerable people, and adults, inclusive of staff, learners, visitors, and volunteers working on behalf, or in conjunction with Genius Junction. Where parts of the Policy relate specifically to a particular age group, this is stated.**

Genius Junction is committed to the safeguarding and well-being of all people and fully recognizes the responsibilities for protecting all groups and characteristics.

There are five main elements to the Policy.

Ensuring that we operate safer recruitment practices in accordance with the legislative document – Keeping Children Safe in Education (2023) –

1. Raising awareness of safeguarding throughout the organisations, ensuring that staff are well equipped with the appropriate knowledge and skills to support learners effectively and help keep them safe.
2. Raising awareness of safeguarding to all people and ensuring that those who are the most vulnerable, are equipped with the skills and knowledge to keep themselves safe
3. Developing and implementing procedures for raising, recording, and investigating any cases or suspected cases of abuse
4. Identifying procedures for accessing additional support and guidance
5. Demonstrating how IT usage is effectively monitored.

Genius Junction recognizes that because of our day-to-day contact with learners, our staff are well placed to observe the outward signs of abuse and therefore, Genius Junction will:

- establish and maintain an environment where learners feel secure, are encouraged to talk, and are listened to
- ensure that learners know there are designated staff within Genius Junction who they can approach if they are concerned or worried
- include opportunities within our ongoing teaching, learning and assessment for learners to develop the skills they need to recognize and stay safe from abuse.

We recognize and adhere to the statutory requirements within the following relevant pieces of safeguarding legislation:

- Children Acts 1989 and 2004
- The Education Act 2011
- United Convention of the Rights of the Child Sept 1990
- Data Protection Act 2018
- Human Rights Act 1998
- Sexual Offences Act 2003
- What to do if you are worried a child is being abused (March 2015)

- 
- Keeping Children Safe in Education: Statutory guidance for schools and college (September 2023)
  - Sexual Violence and Sexual Harassment between children in schools and colleges (2021) (expired)
  - Counter-Terrorism and Security Act 2015
  - Revised Prevent Duty Guidance: for England and Wales (Home Office April 2021)
  - Working Together to Safeguard Children July 2018
  - Protection of Freedoms Act 2012
  - Children and Families Act 2014
  - Special Educational Needs and Disability (SEND) code of practice: 0-25 years – Statutory Guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government Jan 2015
  - Police Act 1997 (Protection of Vulnerable Adults) Regulations 2013
  - Safeguarding Vulnerable Groups Act 2006
  - Mental Capacity Act 2019
  - Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents, and carers; HM Government July 2018

To support our commitment to the safeguarding and wellbeing of all our learners about the above legislation, we will ensure that we have a Designated Safeguarding Lead Person, who has received appropriate training and support for this role.

The Leads in the Safeguarding Team will ensure that:

- all staff are aware and understand their responsibilities in relation to safeguarding and in being alert to the signs and indicators of abuse and for referring any concerns directly to the Designated Lead Person for Safeguarding.
- effective safeguarding procedures are developed, implemented, and monitored to ensure their effectiveness. These procedures are based in the 5 Rs approach of Recognition, Response, Record, Report and Refer.
- effective links are developed with relevant external agencies, local safeguarding boards and there is cooperation with all requirements with any safeguarding referral matters.
- written records are kept of any safeguarding concerns, even when there is no need to refer the matter to the relevant agencies.
- all records are stored securely and in accordance with the Data Protection Act.

Genius Junction recognizes its responsibility for the safeguarding of all learners from abuse and inappropriate or inadequate care and is committed to responding in all cases where there is concern. Due to the nature of our work, Genius Junction may be in the front line with some people. This may mean that we are the first to know that a learner or other person is being or has been abused and that we are concerned about their wellbeing. Everyone has an equal responsibility to ensure that the individual needs and welfare of the person are put first and to safeguard any person with whom we come into contact. This responsibility not only rests with the Board, Directors, Senior Management Team, and

---

Designated Persons but also with every individual member of staff employed or volunteering with our organisations, at an employee's premises, at Genius Junction Offices, or at home.

## 2. Understanding Safeguarding

Safeguarding is a proactive process of protecting and ensuring the safety and wellbeing of all learners. It may involve instances in which a learner is suffering or likely to suffer from harm. Safeguarding involves safer recruitment practices to assist in identifying persons who are unsuitable to work with children and vulnerable adults.

The benefits of safeguarding include:

- Learners are appropriately protected, and all issues are dealt with effectively.
- Staff are clear about individual responsibilities, roles, and boundaries.
- Staff are protected from malicious and misplaced allegations.
- Learners can rely on those in a position of trust.

### 2.1 How do we Define Children, Young People and Adults?

Young learners are defined as any learner who has not yet reached their 18<sup>th</sup> birthday (Children's Acts 1989, 2004).

The Safeguarding and Vulnerable Groups SVGA (2006) no longer labels adults as 'vulnerable' because of the setting in which an activity is received, nor because of the personal characteristics of the adult receiving these activities.

The definition of regulated activity as explained within the Protection of Freedoms Act 2012 identifies those activities provided to any adult which, if any adult requires them, will mean that the adult will be considered 'vulnerable' at the time.

### 2.2 Safeguarding Adults at Risk

The Care Act (2014) Section 14.2 states: The safeguarding duties apply to an adult who: has needs for care and support (whether the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and because of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. An adult is a learner aged 18 or above at the point of enrolment.

The term 'Adult at Risk' is used to describe a vulnerable adult.

An adult is a person aged 18 years and over. There are six categories within the new definition of regulated activity:

- Health care
- Personal Care
- Providing social work
- Assistance with general household matters
- Assistance with the conduct of a person's own affairs
- Conveying

---

Genius Junction recognizes that, in the context of safeguarding learners, any adult can be subjected to abuse, and they do not have to be 'vulnerable' as defined by the Act for Genius Junction safeguarding procedure to be implemented.

### 2.3 Definitions and Types of Abuse or Neglect

Child abuse and neglect are generic terms encompassing all ill treatment of young and adult learners, including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the person's health or development.

Abuse and neglect are forms of maltreatment of a young or adult learner. Somebody may abuse a young or adult learner by inflicting harm, or by failing to prevent harm.

Young or adult learners may be abused in the family or an institution or community setting by those known to them or, more rarely, by a stranger. An adult or adults or another child or children may abuse them.

Working together to Safeguard Children (2010) sets out the definitions and examples of the four broad categories of abuse:

**Physical Abuse** may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately includes illness.

**Emotional/ Psychological Abuse** is the persistent emotional ill treatment of a person to cause severe and persistent adverse effects on his or her emotional development. It may involve conveying to a child or a person that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on a child or person concerned. It may involve causing that child or person to feel frightened or in danger, or exploitation or corruption. Emotional or other forms of abuse may occur because of domestic violence. Some level of emotional abuse is involved in all types of ill treatment or abuse, though it may occur alone.

**Sexual Abuse** involves forcing or enticing a person to take part in sexual activities, whether they are aware it is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activity such as involving them in looking at inappropriate materials or encouraging them to behave in inappropriate ways. Sexual abuse may also take place through the inappropriate use of cameras and images.

**Neglect/ self-neglect** is the persistent failure to meet a person's basic and/ or psychological needs, likely to result in the serious impairment of his or her health or development. It may involve a parent or carer failing to provide adequate medical care or treatment, or oneself. It may also involve the neglect of basic emotional needs.

In respect of adults, the local County Council identifies seven forms of abuse. In addition to the four above they also identify:

---

**Financial Abuse** which is defined by the misappropriation of money or assets; transactions to which the person does not consent, which were invalidated by intimidation or deception; this can also include the misuse of assets. Examples include misuse of benefits, denying access to money, not spending allowances on the individual, and any unreasonable restriction on a person's right to control their lives to the best of their ability.

**Discriminatory Abuse** which is defined as any form of abuse based on discrimination because of a person's race, culture, belief, gender, age, disability, sexual orientation, or marital status.

**Institutional Abuse** which is defined as repeated incidents of poor professional practice or neglect, and inflexible services based on the needs of providers rather than on the persons acquiring the service.

The grooming of children and young people for the purposes of involving them in extremist activity is child abuse and child protection procedures should be followed when there are concerns that a child or young person is at risk of additional types of abuse and unsafe activities which we recognize and which have become more prevalent in recent times, such as:

- Bullying and harassment
- Discriminatory abuse
- Financial abuse
- Domestic abuse
- Alcohol and drugs
- Crime and knife crime
- Cyber crime
- Modern Slavery
- Acts of omission
- Hate Crime/ Mate Crime
- Female Genital Mutilation (FGM)
- Organizational abuse

## 2.4 Signs and Indicators of Possible Abuse

When considering whether there is enough information and evidence to suggest a person has been abused, there are several possible indicators. However, there may also be a perfectly reasonable explanation, so it is important to remain vigilant but not overzealous or jump to conclusions. There may also be no signs or indicators of abuse, however, this does not mean that a report of abuse is false.

## 2.5 Prevent and Safeguarding

The grooming of people for the purposes of involving them in extremist activity is abuse and for children, child protection procedures should be followed where there are concerns that a child or young person is at risk of radicalization or has already been radicalized. There are also clear procedures for adults being radicalized.

---

The UK government currently defines extremism as, “**vocal or active opposition to fundamental British values**, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.”

Radicalization is the process by which people come to support terrorism and violent extremism and, in some cases, then participate in terrorist groups and actions. There is no obvious profile of a person likely to become involved in extremism, or a single indicator of when a person might adopt violence in support of extremist ideas.

People can be exposed to harmful, extremist ideology in the immediate family through the impact of extreme beliefs held by family members including parents and carers or family and friends who live outside the family home but have an influence over the person’s life. Other people might be radicalized over the internet.

The Government’s strategy to reduce the risk from terrorism identifies the need not only to stop terrorist attacks but also to prevent people from becoming terrorists. The Government’s strategy for countering terrorism is CONTEST and the Prevent Strategy forms part of this.

CONTEST has four key strategies:

- Pursue: to stop terrorist attacks
- Prevent: to stop people becoming terrorists or supporting terrorism
- Protect: to strengthen our protection against a terrorist attack
- Prepare: to mitigate the impact of a terrorist attack.

Prevent addresses all forms of terrorism and nonviolent extremism which can create an atmosphere conducive to terrorism and can popularize views which terrorists then exploit. The Prevent Strategy makes it clear that preventing people becoming terrorists or supporting terrorism requires challenges to extremist ideas where they are used to legitimize terrorism and are shared by terrorist groups.

Working to safeguard people, including the provision of early intervention to protect and divert people away from being drawn into terrorist activity, is central to the Prevent Strategy.

Staff who observe any behavior or who hear or are told anything significant by a person, must report their concerns to the Designated Safeguarding Lead or a Safeguarding Officer, immediately.

Genius Junction has a Prevent Risk Assessment in place, which is reviewed and updated bi- monthly and focuses on all aspects of the Government’s Prevent Strategy.

If Genius Junction has any significant concern about a learner, or others beginning to support terrorism and/ or violent extremism, it is required to discuss the concern with the local police so that they can be part of further work to address the issue. Genius Junction works to the Prevent element of the Government’s Counter Terrorism Strategy, and where deemed appropriate, seeks external support through referrals to the Channel



---

Programme.

Channel provides a mechanism for assessing and supporting people who may be targeted by violent extremists or are drawn into violent extremism. Channel uses existing collaboration between local authorities, the police, statutory partners, and the local community to:

- Identify individuals at risk of being drawn into violent extremism.
- Assess the nature and extent of the risk.
- Develop the most appropriate support for the individual concerned.

## 2.6 Sexting

Sexting among people can be a common occurrence where they often describe incidents as 'mundane.' People involved in sexting incidents, will be dealt with (by the Police) as victims as opposed to perpetrators (unless there are aggravating circumstances).

If there is a report, or a suspicion of a sexting incident, it must be remembered that intimate images are typically considered to be illegal images, which is why incidents need very careful management for all those involved.

Genius Junction policy is for all members of staff to report any suspected cases, or cases of sexting to Genius Junction Safeguarding Lead.

Genius Junction Safeguarding Lead will record all incidents of sexting. This includes actions taken and actions that are not taken, together with justifications.

## 2.7 Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a young person under the age of 18 into sexual activity in exchange for something the victim needs or wants, and/ or for the financial advantage or increased status of the perpetrator or facilitator. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

Child sexual exploitation:

- can affect any child or young person, male or female, under the age of 18 years, including 16- and 17-year-olds who can legally consent to sexual intercourse.
- can still be abuse even if the sexual activity appears consensual.
- can include both contact and non-contact sexual activity.
- can take place in person or via technology, or a combination of both.
- can involve force or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- may occur without the child or young person's immediate knowledge (through others copying videos or images that they have created and put on social media, for example).

- 
- can be perpetrated by individual or groups, males or females, and children or adults. The abuse may be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organized abuse.
  - is typified by some form of power imbalance in favor of those perpetrating abuse.

Should there be an incident, or suspected incident of child sexual exploitation, then Genius Junction procedure for safeguarding children, young people and adults is followed.

## 2.8 Child on Child Abuse

Genius Junction is committed to protecting all people from child-on-child abuse. Child on child abuse includes:

- young people aged 16 and 17 who experience physical, emotional, sexual and/or financial abuse, and coercive control, in their intimate relationships.
- young people aged under 18 who are sexually abused in the context of exploitive relationships, contexts, and situations of a person of any age, including another young person.
- any young person under the age of 18, who demonstrates behavior outside their normal parameters of development.
- serious youth violence including murder, rape and GBH between young people under the age of 18.

Genius Junction Policy is for all members of staff to report any suspected cases, or cases of child-on-child abuse of any learners, to Genius Junction Safeguarding Lead.

## 2.9 Honor-Based Violence

Honor-based violence is a violent crime or incident which may have been committed to protect or defend the honor of the family or community.

It is often linked with family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honor-based violence might be committed against people who:

- become involved with a partner from a different culture or religion.
- want to get out of an arranged marriage, want to get out of a forced marriage.
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

Crimes of 'honor' do not always include violence. Crimes committed in the name of 'honor' might include:

- domestic abuse
- threats of violence
- sexual or psychological abuse

- forced marriage
- being held against your will or taken somewhere you do not want to go
- assault.

Genius Junction Policy is for all members of staff to report any suspected cases, or cases of honor- based violence to Genius Junction Safeguarding Lead.

## 2.10 Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is a form of child abuse and as such is dealt with under Genius Junction Safeguarding Policy. At Genius Junction, the Board and Management Team expect safeguarding to be everybody's responsibility and expect all staff to follow this, Policy.

The World Health Organization (WHO) defines FGM as the following:

'Female Genital Mutilation comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons.'

Genius Junction has taken information from several documents including the Government's Home Office Guidelines and the Ofsted Guidelines for Inspecting Safeguarding. The UK Government has written advice and guidance on FGM that states that:

"FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practiced on a child it is a violation to right of life, their right to their bodily integrity, as well as their right to health. The UK Government has signed several international human rights laws against FGM, including the Convention on the Rights of a Child."

"UK communities that are most at risk of FGM include Kenyans, Somalis, Sundanese, Sierra Leoneans, Egyptians, and Eritreans. However, women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women."

Indications that a child or young people is at risk of FGM include:

- the family come from a community that is known to practice FGM.
- in conversation a child or young person may talk about FGM.
- the child or young person may express anxiety about a special ceremony. the child or young person may talk or have anxieties about forthcoming holidays to their country of origin.

Where Genius Junction has any concerns that a child or young person is at risk of FGM, then we refer to individual's Local Safeguarding Board for advice.

Where a child or young person discloses that they are victims, or may be victims of FGM, Genius Junction procedures for reporting suspected abuse of children, young people and adults is followed.

---

## 2.11 Forced Marriage

A person may be at risk of forced marriage if their family belongs to a community which practices arranged marriage – but this does not mean a marriage will be forced.

Indicators may be that their family prepares for a holiday, they talk about going abroad and/ or a ceremony taking place with a sense of reluctance, they say goodbye to friends with a sense of this being permanent or they seem distressed or tearful.

Genius Junction Policy is for all members of staff to report any suspected cases, or cases of forced marriage to Genius Junction Safeguarding Lead.

## 2.12 Knife Crime

Knife crime is a term used commonly in the media to refer, primarily, to street-based knife assaults and knife carrying. However, there are many different criminal offences relating to knives. For example:

- it is an offence to threaten or cause harm to a person with a bladed weapon.
- some bladed weapons are prohibited from being sold or purchased, including to anyone under the age of 18.
- offences such as robbery or assault can be aggravated if a knife is involved.
- it is also an offence to carry a knife in a public place without good reason.

According to the Ofsted paper: '*Safeguarding Children and Young People in Education from Knife crime*,' since September 2018, knife crime had increased by 68.4% across England and Wales compares with the 12 months up to September 2014 and 55% across the Metropolitan Police Service area of London over the same period. Public perception of knife crime being a problem in London has increased and 26% of respondents to the London Public Attitude Survey 2018 felt that knife crime was a problem compared with 20% a year earlier.

Knife crime is an increasing safeguarding risk to people, both at school and in their local communities. Whilst there is no clear answer to the question of the cause of knife crime, where a person discloses that they may be at risk, or Genius Junction suspects that there may be cause to be suspicious that a person is at risk or involved in knife crime, all cases are to be reported to Genius Junction Safeguarding Lead.

## 2.13 Human Trafficking

Human Trafficking involves men, women and children being brought into a situation of exploitation using violence, deception or coercion and forced to work against their will. People can be trafficked for many different forms of exploitation such as forced prostitution, forced labor, forced begging, and forced criminality, domestic servitude, forced marriage or forced organ removal. When children are trafficked, no violence, deception or coercion needs to be involved; simply bringing them into exploitative conditions constitutes trafficking.

People trafficking and people smuggling are often confused. People smuggling is the illegal movement of people across international borders for a fee, and upon arrival in

---

the country of destination, the smuggled person is freed. The trafficking of people is fundamentally different as the trafficker is facilitating the movement of that person for the purpose of exploitation. There is no need for an international border to be crossed in cases of trafficking; it occurs also nationally, even within one community.

Genius Junction Policy is for all members of staff to report any suspected cases, or cases of human trafficking to Genius Junction Safeguarding Lead.

## **2.14 Modern Slavery**

Modern Slavery refers to the illegal exploitation of people for personal and/ or commercial gain; victims are trapped into servitude that they were deceived or coerced into. Modern Slavery may include:

- criminal exploitation - pick pocketing, shoplifting, drug trafficking.
- domestic servitude - forced to work in private houses with restricted freedoms, long hours, and no pay.
- forced labor - long hours, no pay, and poor conditions, verbal, and physical threats.
- sexual exploitation prostitution and child abuse.
- other forms - organ removal, forced begging, forced marriage and illegal adoption.

Possible indicators that an individual is being subjected to modern slavery is where an individual may:

- look undernourished or unkempt
- be withdrawn, anxious and unwilling to interact
- appear to be under the control and influence of others
- live in cramped, dirty, overcrowded accommodation
- have no access or control of their passport or identity documents or use false or forged documents
- appear scared, avoid eye contact, and be untrusting
- show signs of abuse and/or have health issues
- show old/ untreated injuries, or delay seeking medical care with vague/ inconsistent explanation for injuries
- appear to wear the same or unsuitable clothes, with few personal possessions
- fear authorities and in fear of removal or consequences for family
- be in debt to others or a situation of dependence.

Genius Junction Policy is for all members of staff to report any suspected cases, or cases of modern slavery to Genius Junction Safeguarding Lead.

## **3. Safeguarding Structure and Responsibilities**

The Designated Safeguarding Officer is part of Genius Junction Senior Management Team. They have a key duty to take a lead responsibility for raising awareness within the staff, of issues relating to the welfare of all and the promotion of a safe environment for them. This includes:

- 
- Overseeing the referral of cases of suspected abuse, radicalization or allegations to the County Council's Department of Children and Young People's Services or other agencies such as the Police or Channel, as appropriate.
  - Providing advice and support to staff on issues relating to child/ adult protection.
  - Maintain a proper record of any child/ adult protection referral, complaint, or concern, even when the concern does not lead to a referral
  - Ensuring that all staff receive basic training in child/ adult issues and are aware of Genius Junction Safeguarding Policy

Genius Junction takes the view that all staff and learners are required to take shared responsibility for the protection and safety of all on site and off site at employers' sites and training venues.

Processes are in place to check the suitability of staff working directly with children and young people. Some staff and learners across the Company will be in regular or significant contact with all learners during their teaching or other work. There is a commitment that such staff have a satisfactory Disclose and Barring Service (DBS) enhanced check in place.

Genius Junction has processes in place to ensure that external speakers/ trainers on site are checked.

### **3.1 Safer Recruitment**

Genius Junction has written recruitment and selection procedures which can be found on Genius Junction Website. The policy and procedures are designed with the aim of safely recruiting staff and providing a safe environment for all learners to learn in. Key aspects of the procedure are as follows:

- Job descriptions are available for all roles. All jobs contain explicit responsibility for safeguarding and promoting the welfare of learners, having due regard for Genius Junction Safeguarding Policy.
- A person specification setting out the key criteria is available for all roles. The person specification includes demonstrating commitment to safeguarding policies and the suitability to work with children, young people, and adults.
- Advertising of posts externally as appropriate.
- A requirement for those appointed to produce documentary evidence of academic/ vocational qualifications.
- Standard interview questions for tutor appointments and other key staff who work with learners, exploring their suitability. Interviewers are advised to follow up on any gaps or discrepancies in the employment history of an applicant.
- Two satisfactory references are obtained for each successful applicant as a condition of their employment. The first reference should be from the applicant's existing or most recent employer. The second reference should also be from another employer. Character references are only used where an applicant has little or no work experience.
- Online and social media checks will be limited to information made accessible online for professional purposes.

Genius Junction reserves the right to deny employment to individuals where permitted criminal record checks suggest they may pose a danger to the learning community.

---

Genius Junction also reserves the right to suspend and/ or dismiss staff members, in accordance with its employment procedures, from employment or undertaking a specific role with respect to that employment. This may apply if information was withheld when requested, about their criminal record at the point of employment, or a criminal record acquired during employment.

All members of staff working closely with learners must be alert to the possibilities of abuse, radicalization, and any concerns about the behavior of any adult with respect to a learner should be reported in accordance with procedures. This will be supported by relevant training, skills development and updated to ensure recognition, response, reporting, recording, and referral are all to the required standard.

Any staff member can seek support from Genius Junction Human Resources Department who will provide appropriate support, such as occupational health screening or counselling.

DBS disclosures will be obtained for all staff and volunteers working in 'regulated positions' (as defined by the Criminal Justice and Court Services Act 2000) with children, young people, or adults, as per IAS guidelines this will be renewed every three years. Genius Junction, where appropriate, evaluates information to determine an individual's suitability to work in such activity and environments.

Where staff are not engaged in regulated positions, but are involved in activities that may involve children, young people or adults, a risk management approach is taken to the delivery of learning and teaching, and activities involving the wider public.

## 4. Reporting

### 4.1 Procedures for Reporting Cases of Suspected Abuse Involving Children, Young People and Adults

#### The duty to report

Genius Junction and all its members of staff have a legal duty to report cases of suspected abuse. If you, as a member or staff, have concerns that a learner has been mistreated or abused, you **MUST** report this.

#### What to do if you notice or suspect abuse?

You may become aware of potential abuse in two main ways.

- You may observe signs in a learner that lead you suspect that they have become physically, emotionally, or sexually abused, or suffered severe neglect, or are becoming radicalized, or they may be experiencing financial, discriminatory, or institutional abuse.
- The learners themselves may disclose to you that they have been abused.

If an individual discloses to you that they (or indeed another person) have been, or are being abused, or feel at risk of being abused:



---

## DO

- Listen very carefully to what they tell you
- If you can, write brief notes of what they are telling you while they are speaking (these may help later if you must remember exactly what was said) – and keep your original notes, however rough. It is what you wrote at the time that may be important later – not a tidier and improved version you wrote up afterwards. If you do not have the means to write at the time, make notes of what was said as soon as possible afterwards.
- Take what is said seriously and accept what you are told
- Stay calm and reassure the individual that they have done the right thing by talking to you
- Write down as soon as you can, exactly what you have been told
- Tell them that you must pass this information on but only to those that need to be told
- Tell them to whom you will report the matter.

## DO NOT

- Panic
- Promise to keep things secret. You have a duty to refer a child, young person or adult who is at risk
- Lie or say that everything will be fine now that they have told you
- Criticize the abuser, especially if this is a parent or carer
- Ask a lot of detailed questions. Instead ask questions such as, 'Do you have anything else to tell me?'
- Press for answers that the individual is unwilling to give
- Attempt to carry out an investigation of suspected or alleged abuse by interviewing people etc. – Genius Junction designated safeguarding team, Social Services and Police staff are the people trained to do this – you could cause more damage and spoil possible criminal proceedings.

It is important that the person to whom the disclosure is made does not investigate or question the person concerned except to clarify what they have heard. This is particularly important in cases of sexual abuse.

It is very important, as accurately as possible, to record what was said to you when you have received the disclosure of abuse. All written records should be handled confidentially.

If a person discloses to you that they or another have been abused, or if you suspect from what you observe that they are being abused **YOU MUST REPORT THIS** to the Designated Safeguarding Lead, or in their absence, the Safeguarding Officer.

If for any reason you are unable to contact a member of the safeguarding team and the matter is urgent, then contact the Local Authority or the Police directly and report the matter to the Designated Safeguarding Lead or Officer, at the next available opportunity.



---

In all cases, if you are concerned, the rule is to pass this on quickly and to seek help and further support rather than to worry alone or do nothing.

## 4.2 Complaints and Allegations against Staff and Volunteers

Genius Junction take seriously all complaints made against adults in positions of trust. Procedures are in place for learners, parents/carers, and staff to share any concern that they may have about the actions of any member of staff or volunteer. Allegations made against staff and volunteers will be dealt with according to the process laid out in DfE guidance and local social care/police arrangements where each college is located will be followed to investigate and resolve complaints without delay.

The Lead for Safeguarding is the identified Designated Member for Allegations against Staff and Volunteers (DMAASV) who will deal with issues of staff (or volunteer) inappropriate conduct towards a learner.

The DMAAVS confirm the details of individual cases and to reach a decision on the way forward, including reporting the matter to the Local Authority Designated Officer (LADO).

If the Chief Executive or Chair of Governors is the subject of the allegation or concern, this should also be reported to the Safeguarding Lead (or Deputy) in order that they may activate the appropriate procedures.

Staff will not investigate cases of suspected abuse themselves. Genius Junction will cooperate fully with the Police and Children's Social Care. Please refer to the procedures detailed in WRIKE and refer to the Staff Code of Conduct.

## 4.3 The Operation of the Designated Safeguarding Team

When a member of staff refers a case of suspected abuse to a member of the Safeguarding Team, he or she decides whether the situation should be referred to the Local Authority, the Police or Channel, or whether some other course of action is more appropriate. In coming to a decision about what action to take, the member of the Safeguarding Team may take advice from the provider's contact at the local authority. If they consider that abuse or radicalization has taken place, or that a person is at risk of abuse, they will formally notify the Local Authority, the Police or Channel about this.

At this point, the Local Authority will take over responsibility for the issue. If they decide that there are serious concerns, they will initiate a formal assessment and, where circumstances warrant it, involve the police.

Involvement in cases of suspected abuse/ radicalization can be personally disturbing and distressing. Although the individuals involved in taking the disclosure may feel a need to talk about it with someone (a colleague, a friend or partner) they should avoid this, to respect the confidentiality of the person concerned. If a member of staff feels that they need to talk to someone, they should contact the Human Resources Department. Disclosure of or being the subject of abuse is obviously a very difficult and distressing

---

time for the child, young person, or adult, who needs to be offered continued support by Genius Junction. The person should be made aware of the support available to them and helped to initiate contact with this support if so desired.

A confidential record will be kept of all cases referred to the Safeguarding Team, including details of cases referred to the Local Authority, the Police, Channel, or other services. These written records will be kept securely, with any paper information held securely by the Safeguarding Team.

#### 4.4 **Low-level concerns**

Genius Junction encourages and promotes a culture whereby staff feel enabled to report concerns about a colleague's conduct and have confidence that those concerns will be taken seriously. All concerns, whether they meet the harm threshold, will therefore be recorded to enable Genius Junction to build a picture of suitability over time.

Low level concerns are those that do not meet the harm threshold. It does not mean that these concerns are not significant, a low-level concern is any concern, no matter how small, and even if no more than a 'nagging doubt,' that an adult working on behalf of Genius Junction may have acted in a way that is inconsistent with the staff code of conduct, examples can include but are not limited to:

- Being over-friendly with young people;
- Having favorites
- Taking photographs of young people on their personal mobile phones;
- Engaging with a young person on a 1:1 basis, behind closed doors or in a secluded area, in certain circumstances, it may be appropriate for safeguarding/welfare/counselling staff to do this, and/or Using inappropriate, intimidating, offensive or overly sexualized language.

Such behavior exists on a spectrum from inadvertent/thoughtless or behavior that may look to be inappropriate but may not be in the specific circumstances through to what is ultimately intended to enable abuse. It is important, therefore, that concerns are shared with the DSL, who will make a judgement about the seriousness and, where necessary, seek advice from the LADO.

Concerns raised about contractors and associate staff will be shared with the individual's employer and may be escalated to the LADO.

Low level concerns will be recorded in a confidential spreadsheet by the HR. Where necessary appropriate advice and guidance will be given to staff members in respect of how their behavior may be interpreted by others and support offered to enable colleagues to perform their duties in line with the Genius Junction code of conduct. The advice given and by whom will be recorded confidentially.

Low level concerns will be reviewed on a half-termly basis by the DSL and HR. This enables the DSL and HR to identify concerning patterns of behavior which may need to be escalated through Genius Junction disciplinary processes or escalated to the LADO. This action will be recorded.

Low level concerns will not be referred to in references unless they have been escalated through formal disciplinary procedures or escalated to the LADO.

---

Whenever staff leave the organisations, consideration will be given as to whether that information needs to be kept. In making this consideration, Genius Junction will make a judgement about whether any or all the information contained may have any reasonable value in terms of historic employment or abuse claims. Where this is not the case records will be destroyed/deleted.

#### 4.5 Martyn's Law

On Monday 19th of December 2022, the government announced details for the Protect duty, now to be known as Martyn's Law in Tributes, and Martyn Hett, who was killed alongside 21 others in the Manchester Arena terrorist attack in 2017. The bill to introduce it officially is currently going through parliamentary process.

Martyn's law will keep people safe, enhancing on national security and reducing the risk to the public from terrorism by the protection of public venues.

Even though Genius Junction does not naturally fall into the scope of the duty for the standard tier as occupancy at any one time is below 100 in any of our centers, it is important that all staff are aware.

[Home Office in the media \(blog.gov.uk\)](https://www.gov.uk/government/news/martyns-law-to-ensure-stronger-protections-against-terrorism-in-public-places)

<https://www.gov.uk/government/news/martyns-law-to-ensure-stronger-protections-against-terrorism-in-public-places>

#### 5. Designated Persons Responsible for Safeguarding - Contacts

Responsibility	Designated Person	Telephone	Email
Designated Lead	Nicola Ellahi	07496337170	safeguarding@geniusjunction.co.uk

---

## Other Safeguarding Contacts

- The Police – 999
- NSPCC - 0808 800 5000

Approved and Signed by:

Venkateshwar Puli  
Director

