**Scope**

At Genius Within CIC (“the Company”), we provide coaching, training and assessment to adults and young people from neurominorities. We have a small administration office, a Social Justice team who work in Prisons and community settings with vulnerable adults and young people, and a network of Associates who work with our clients in their place of work.

This Policy outlines the actions the Company takes in recognition of the right for every individual to stay safe in line with the Working Together to Safeguard Children Guidance 2018, Safeguarding Vulnerable Groups Act 2006, The Protection of Freedoms Act 2012 and The Care Act 2014.

**Defining Safeguarding and the Care Act 2014**

Our embedded safeguarding practices ensure the protection of adults at risk of harm from abuse wherever possible. We also protect our clients by responding to circumstances that arise in the course of our work.

We have a duty of care to our employees and Associates when they are working on our behalf, and we take this very seriously.

Abuse can be caused by those inflicting harm, those who fail to act to prevent harm or by individuals to themselves. Abuse is not restricted to any socio-economic group, gender or culture.

Section 1 of the Act requires a local authority to promote individual wellbeing in all it does, including ‘protection from abuse and neglect’. Under the Act, local authorities are the lead adult safeguarding agency and are primarily the first point of contact for raising concerns. The Act puts the emphasis on employers to ensure that the welfare of all adults is ensured, and that the employer has appropriate levels of safeguarding in place.

All adults have the right to be protected from abuse and poor practices regardless of their:

* Gender/gender re-assignment
* marriage or civil partnership status
* race (including ethnic origin, skin colour, nationality and national origin)
* disability (including neurominorities and health conditions)
* sex and sexual orientation
* pregnancy or maternity status
* religion or belief
* age

The Care Act 2014 recognises 10 categories of abuse:

* modern slavery
* self-neglect
* emotional and psychological abuse
* organisational abuse
* physical abuse
* sexual abuse
* neglect and acts of omission
* financial (or material) abuse
* domestic abuse
* discrimination

However, abuse can also take place in the form of:

* bullying, including cyber bullying
* radicalisation
* ‘mate’ hate (where someone befriends you for their own dishonest purposes)
* forced marriage

**See Appendix 1 for a full list of types of abuse**

**Responsibilities**

The Company has a duty of care to ensure that our colleagues (employees and Associates), customers and end-user clients are not subjected to abuse during the course of our business. Also, that abuse or the intent to harm is recognised and responded to wherever it occurs.

Overall company responsibility for safeguarding rests with our CEO (Jacqui Wallis). Day-to-day responsibility for safeguarding is delegated to Drew Goddard Social Justice Team Leader. If Drew is unavailable our Chief Operating Officer Fiona Barrett is to be your next point of call to discuss any safeguarding concerns.

Contact details for the Safeguarding Team are:

Drew Goddard e: drewgoddard@geniuswithin.org mob: 07935 125 760

Fiona Barrett e: fiona@geniuswithin.org, mob: 07866 006 934

All colleagues have a responsibility to:

* Follow the guidance in this Policy and report **any and all** safeguarding concerns using the correct procedure.
* Follow safe recruitment procedures, including DBS checks for relevant roles involving contact with vulnerable adults, in accordance with the Rehabilitation of Offenders Act (1974). Other relevant recruitment checks will also be carried out, including HMG Baseline Personnel Security Standard and prison vetting and clearance.
* Cooperate with investigations by Adult Social Care, and support any protection plans put in place by the social care team.
* Complete appropriate training needed for their role; annual safeguarding for all employees and associates, and annual prevent training for Social Justice employees.
* If you are unsure whether it is a safeguarding concern it is your responsibility to make contact with a member of the safeguarding team. Your first point of contact should always be Drew and is if he unavailable then Fiona. It is always best to ask and gain clarity and know that you have made the right choice of action.

**What kind of signs to look out for**

Abuse and neglect could fall under a number of categories. Although not an exhaustive list, some signs to look for in contact with individuals at risk of harm or abuse include:

* Unusual injuries, including bruises, burns, fractures, bite marks or
* signs of self-harm
* Consistently poor hygiene, poor living conditions or inappropriate clothing
* Communicating aggressively or using sexual language
* Appearing withdrawn, guarded, anxious or frightened, particularly around certain individuals
* Hearing or seeing shouting, violence or intimidation
* Adults keeping children, or adults in need of support, from view, and unsupervised children visiting a house where only adults live.

**Making it Work – Reporting Actions and Beyond**

|  |  |  |  |
| --- | --- | --- | --- |
| Situation | Likely Scenario |  Actions for employee and associate | Safeguarding Team |
| Emergency | Where there is an emergency situation and an individual is causing actual physical self-harm (e.g. attempting to stand on window ledge, using an instrument to cause harm, states on the phone ‘I am taking the pills now’), or harm to another (e.g. hitting another person | Seek immediate assistance from the Emergency Services (999): Police, Ambulance or Fire Brigade | The Safeguarding Team will raise an Incident Report and complete a full investigation with the colleague within 5 working days |
| In prison/probation settings, press panic button and call for help from the Prison Officers. | The Prime will be notified within 24 hours. |
| In all circumstances, the colleague should seek to remove themselves from any danger and not attempt to resolve the incident by themselves. |  |
| Contact Safeguarding Team as soon as it is safe to do so. |  |
| Intent to Harm | Where an individual makes a clear and outright statement of intention to self-harm or cause harm to others, or they disclose potential harm to others. Explore options for the individual to seek support and assistance outside the session/phone call. These options may include, but are not limited to, calling ACAS, NHS help lines, organisational helplines, GP or existing clinical practitioners the client has contact with. | In-Work Supportcontact the Nominated Person within 24 hours of the session and Safeguarding Team. Call the client and/or their nominated person 24 hours after the incident to establish their wellbeing. Coaching sessions will be put on hold until the client has sought clinical support. | The Safeguarding Team will raise an Incident Report and complete a full investigation with the colleague within 5 working days The referral company will be advised within 24 hours of the incident |
| Social Justice- prison and probation setting contact the Prison Officer or Offender Manager before leaving the site and inform the Safeguarding Team within 24 hours. | The Prime will be notified within 24 hours. |
| Employability Team contact the Safeguarding Team and your line manager within 24 hours. | The Prime will be notified within 24 hours. |

As part of our duty of care to the colleague reporting a safeguarding incident, a phone call or a face-to-face meeting will be arranged within 72 hours of the incident. This will be made by the Safeguarding Team to ensure the colleague is ok and has access to any support that they need.

Safeguarding procedures and issues are a regular agenda item at management meetings, and policies, procedures and training are reviewed and monitored regularly.

It is important to remember that this information is sensitive and should only be shared to the necessary people in order to help manage this situation.

**Discriminatory Abuse**

Our colleagues work with a clean feedback model to separate what has been seen and heard from its interpretation. We will work with this model to remain neutral in incidents which may be perceived as discrimination by a colleague or Manager in the workplace.

However, where the evidence seen and heard is deemed to place the client/individual at risk, they will be guided to their own company or ACAS help line.

In extreme cases where the client/individual is showing evidence of being at risk, the Nominated Person will be contacted. Where the nominated representative is the source of the discrimination an alternative person should be sought and contacted.

**Radicalisation**

Genius Within CIC and the Board understands its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism and

seeks to meet its obligations in the ways shown below.

Radicalisation is of growing concern especially within the prison population. **Prevent** is one of the four elements of Contest, the government’s counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The **PREVENT** strategy:

* responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote their views
* provides practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
* works within a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with

The strategy covers all forms of terrorism, including far right extremism and some aspects of non-violent extremism.

Any frontline staff in regular contact with members of the public may be the first to see signs of concern and are made aware of the processes for safeguarding individuals vulnerable to being drawn into terrorism.

They all complete online training at:

<https://www.elearning.prevent.homeoffice.gov.uk>

Their completion certificates are kept on their HR file.

**Further Guidance**

Our Essentials Handbooks for In Work Support, Social Inclusion and HMPPs contain the timelines for handling Safeguarding Incidents in each setting.

Our Safeguarding Policy does not stand alone, but is implemented via a range of policies and procedures, including:

* **Whistle Blowing/Anti-fraud Policy** –ability to inform on other staff/practices within the organisation
* **Grievance and Disciplinary Procedures** – to address breaches of procedures/policies
* **Health and Safety Policy**, including lone working procedures, mitigating risk to staff and clients and following co-location protocols
* **Equality and Diversity Policy**– ensuring safeguarding procedures are in line with this policy, in particular around discriminatory abuse and ensuring that the safeguarding policy and procedures are not discriminatory
* **GDPR** - how records are stored and access to those records
* **Confidentiality Policy** and coaching contract/consent forms that ensure everyone we work with is aware of our duty to disclose
* **Staff induction** – during induction, safeguarding procedures and practices are covered
* **Staff training** – all staff and associates are required to complete an appropriate level of Safeguarding training to their role, and attend annual safeguarding training.
* **Prevent Policy**- addresses Contest Strategy and role of Genius Within.

This Policy must be signed and understood as a separate and prioritised policy, upon completion of safeguarding training.

**Training**

The Company commits resources for induction, training of colleagues, effective communications, and support mechanisms in relation to safeguarding. Annual training provided by Genius Within covers the following:

* Categories of abuse
* Potential risks to adults, who may pose a risk, what situations may increase risk
* How to spot and respond to signs of concern, what are the potential signs of abuse
* Guidance on reporting an incident
* Changes in legislation and up to date practices

**Support**

We recognise that involvement in situations where there is risk or actual harm can be stressful for the colleague(s) concerned. The mechanisms in place to support staff include:

* debriefing support so that they can reflect on the issues they have dealt with
* seeking further support as appropriate, e.g. access to counselling
* colleagues who have initiated protection concerns will be contacted by their Manager, supervisor or safeguarding lead within 72 hours
* associates will be encouraged to seek further support with their own independent supervisor, whilst retaining the confidentiality of Genius Within

**Professional Boundaries**

The following actions are strictly prohibited:

* selling to or buying items from a client
* accepting responsibility for any valuables on behalf of a client
* accepting money as a gift/borrowing money from or lending money to clients
* accepting gifts/rewards or hospitality from an organisation as an inducement for either doing/not doing something in their official capacity
* engaging in social media contact or private contact with a client receiving a service other than our official Company Facebook, Instagram, Linkedin and Twitter feeds

If the professional boundaries and/or policies are breached, this could result in disciplinary procedures. If a conflict of interests arises it should be discussed with your Manager or supervisor.

**Allegations Management**

The Company recognises its duty to report concerns or allegations against its employees or Associates within the organisation, or by a professional from another organisation.

The process for raising and dealing with allegations is as follows:

* Any employee or Associate is required to report any concerns in the first instance to their line Manager/safeguarding Manager/peer. A written record of the concern will be completed, using the Company Incident Log, which is reviewed monthly as part of our management meeting protocol. Each incident will be monitored within the strict timelines outlined in our Compliments and Complaint Policy.
* Concerns will be investigated by the Safeguarding Manager or a Director.
* Concerns regarding Health and Care Professionals Council and British Psychological Society registered people will be relayed to these bodies.

**Managing Information**

Information will be gathered, recorded and stored in accordance with the following policies:

* General Data Protection Regulation (GDPR) Policy
* Confidentiality Policy

All employees and Associates must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the safeguarding manager or the Directors.

All employees and Associates must be aware that they cannot promise service users or their families/carers that they will keep secrets.

The Company will make clients aware of our Safeguarding Policy in the first meeting.

This policy will be reviewed by the Directors every year and when there are changes in legislation.

|  |  |
| --- | --- |
| **Confirmation of reading** | I confirm that I have been made fully aware of, and understand the contents of, the Safeguarding Policy and Procedures for Genius Within CIC.Please complete the details below and return this completed form to: HR@geniuswithin.co.ukName : Signature:Date: |

**Useful contacts/information**

**999**

In an emergency (especially if someone is in **immediate danger of harm**) you should **always call 999** and ask for the police. Having relevant information to hand will help give you the advice you need quicker.

**Samaritans**

Call the free 24 hour helpline on 116 123 or email jo@samaritans.org

**Mind**

Non-urgent information about mental health support and services that may be available to you, please call the Infoline on 0300 123 3393 or email info@mind.org.uk. If you feel more comfortable texting, you can send your texts through to 86463.

**Shout**

Text SHOUT to 85258 for free 24 hour confidential mental health support.

**Anna Craft Trust**

Front line staff build up a directory of local safeguarding board and emergency duty teams. Resources: <https://www.anncrafttrust.org/>

**Local Safeguarding Boards:** multi-agency body set up in every local authority. Use the links below to find your local safeguarding board for adults and children respectively.

<https://www.safecic.co.uk/crb-purchase/55-free-downloads-and-safeguarding-links/60-safeguarding-adults-board-links>

<https://www.safecic.co.uk/your-scb-acpc/55-free-downloads-and-safeguarding-links/61-safeguarding-children-board-links>

**Papyrus- Prevention of Young Suicide for people under 35**

www.papyrus-uk.org/?gclid=EAIaIQobChMI0YmjhfHP9QIVx7LVCh1OogHaEAAYASAAEgJxZfD\_BwE

Hopeline- 0800 068 41 41

**Appendix- Types of Abuse**

The following lists the types of abuse that may be perpetrated or presented and that should be reported. It is not exhaustive.

**Physical abuse**

This may include hitting, slapping, scratching; pushing or rough handling; assault and battery; restraining without justifiable reasons; inappropriate and unauthorised use of medication; using medication as a chemical form of restraint; inappropriate sanctions including deprivation of food, clothing, warmth and health care needs; female genital mutilation (which comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons); ‘Honour-based’ violence.

Important: Any disclosure of FGM about a female under 18 must be reported immediately to the Police.

**Sexual abuse**

This includes sexual activity which an individual cannot or has not consented to or has been pressured into; sexual activity which takes place when the person is unaware of the consequences or risks involved; rape or attempted rape; sexual assault or harassment; non-contact abuse such as voyeurism, pornography; sexual exploitation including escort work and prostitution.

**Psychological abuse**

Emotional abuse; verbal abuse, humiliation and ridicule; threats of punishment, abandonment, intimidation or exclusion from services; isolation or withdrawal from services or supportive networks; deliberate denial of religious or cultural needs; forced marriage; failure to provide access to appropriate social skills and educational development training; faith abuse.

**Exploitation**

Opportunistically or premeditated exploitation includes unfairly manipulating someone for profit or personal gain; forced labour; modern slavery; domestic servitude; human trafficking; forced labour; radicalisation; gang associated sexual exploitation and sexual violence; debt bondage - being forced to work to pay off debts that realistically will never be cleared.

**Financial abuse**

Having money misused or stolen; having property stolen; being defrauded; being put under pressure in relation to money or property; having money or property misused.

**Neglect and acts of omission**

This includes ignoring medical or physical care needs; failure to give prescribed medication; failure to provide access to appropriate health, social care or educational services; neglect of accommodation, heating, lighting etc.; failure to give privacy and dignity; professional neglect.

**Self-neglect / self-injurious behaviour**

This should necessitate assessment by social and/or health care professionals which should be carried out within the guidance contained within the Mental Capacity Act 2005.

**Discrimination**

Discrimination demonstrated on any grounds including sex, race, colour, language; culture, religion, politics or sexual orientation; discrimination that is based on a person’s disability or age; harassment and slurs which are degrading; see also hate crime.

**Domestic abuse**

The definition of domestic abuse applies to males and females and is referred to as:

“a pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimated partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: psychological; physical; sexual; Financial; emotional.”

Note: When a child or children disclose that they have witnessed domestic abuse, including hearing the abuse, this must be reported as a safeguarding issue.

**Hate Crime**

Any hate incident, which constitutes a criminal offence, perceived by the victim or any other person, as being motivated by prejudice or hate relating to age, disability, gender, gender identity, sexual orientation, socio-economics, race/ethnicity, religion/beliefs or lifestyle choice.

**Mate Crime**

Abuse of an adult with care and support needs where the victim is being abused or exploited by one or more people who the victim wanted to be their friend, particularly in situations where the victim was otherwise isolated and lonely.

**Radicalisation**

This occurs where individuals or groups are presented with violent extremist ideologies and behaviours that are conducive to terrorism or are shared by terrorist groups.

**Child Abuse – specific definition**

Important: In the UK, unborn children are not given legal recognition. However, child protection procedures can apply to parents-to-be if there is a reasonable belief that the baby will be at risk of significant harm when it is born.

A form of maltreatment of a child: somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

Child abuse also includes the following:

**Child Grooming**

Child grooming refers to an act of deliberately establishing an emotional connection with a child to prepare the child for child abuse. Child grooming is undertaken usually to carry out sexual abuse and other child exploitation like trafficking of children, child prostitution or the production of child pornography. Currently child grooming occurs through the use of internet.

**Forced Marriages**

Genius Within is sensitive to differing family patterns and lifestyles and child-rearing patterns that vary across different racial, ethnic and cultural groups. Forced marriage is a form of child, adult and domestic abuse and, in line with statutory guidance, is treated as such. Child abuse cannot be condoned for religious or cultural reasons.

**Online abuse**

This is any type of abuse that happens on the internet or mobile networks using fixed or mobile devices, whether through social networks, playing online games or using mobile phones. It includes sexting which is simply defined as “images or videos generated by children under the age of 18, or of children under the age of 18 that are of a sexual nature or are indecent”.

**Child Exploitation**

Defined as ‘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 through the use of 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. 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’. (Safeguarding Children and Young People from Sexual Exploitation 2009)

**Contextual Safeguarding**

Working Together to Safeguard Children 2018 recognised a range of threats to the welfare of children and young people which are outside of their families. These extra familial threats might arise outside school and other educational establishments from within peer groups or more widely from within their communities and on line. This is known as contextual safeguarding which covers multiple threats such as exploitation by criminal gangs and organised crime gangs such as County lines, trafficking, online abuse, sexual exploitation and the influences of extremism leading to radicalisation.

**Safeguarding FAQs**

**Who’s responsibility is it?**

Safeguarding is **everyone’s responsibility**; for services to be effective each professional and organisation should play their full part. Professionals and organisations must work in partnership to protect adults in need.

**Do I have to complete the training every year?**

Yes. Safeguarding is everyone’s responsibility and therefore we request that the training is **completed annually** be **everyone.**

All colleagues will have access to safeguarding training at an appropriate level. Sources and types of training can include:

• in-house induction training

• ongoing CPD modules and refreshers in house

• PREVENT training https://www.elearning.prevent.homeoffice.gov.uk

**What are safeguarding procedures?**

Procedures and systems provide clear guidance on what to do in various circumstances; they clarify roles and responsibilities.

**What is Genius Within safeguarding procedure?**

* **Responsibility**- the company and all colleagues.
* **Timeline –** act immediately by contacting one of the safeguarding points of contact as stated in the policy and they will advise how to proceed moving forward.
* If you are unsure what to do ask and seek guidance.
* If you believe there is imminent harm to a person/persons call 999.

**What constitutes as harm?**

Any damage – Financial, physical, psychological, sexual, neglect – caused to a vulnerable person. This could be due to another person, or people, deliberately taking advantage of someone. But it could also be the adult or child who is unintentionally putting themselves at risk, simply because they don’t have the right level of support in place.

**What is a safeguarding policy?**

A policy that is put in place to ensure vulnerable people are not abused in any way. It makes it clear what an organisation or group will do to keep children and adults safe.

**What is the aim of safeguarding adults?**

To protect adults classed as ‘vulnerable’ – this covers people of all ethnicities, genders and religious, and provide them with appropriate care.

The primary aim of safeguarding is to keep an individual safe and prevent further abuse from occurring. It also includes the duty to Promote Individual Wellbeing, the duty to prevent or reduce the likelihood of further Care and Support needs developing and the duty to provide good information and advice.

**What is the meaning of duty of care?**

A moral or legal obligation to ensure the safety and wellbeing of others. It is about individual wellbeing, welfare, compliance and good practice.

All workplaces have a moral and a legal obligation to ensure that everyone associated with the establishment is fully protected from any personal physical and/or emotional harm, either on the premises or when engaged in activities relating to the establishment.

**Who to contact in Genius Within if you have a safeguarding concern?**

If there is an immediate threat to life then call 999.

If it is not an immediate threat to life then you are to contact Drew Goddard Social Justice Team Leader. If Drew is unavailable our Chief Operating Officer Fiona Barrett is to be your next point of call to discuss any safeguarding concerns.

Contact details for the Safeguarding Team are:

Drew Goddard e: drewgoddard@geniuswithin.org mob: 07935 125 760

Fiona Barrett e: fiona@geniuswithin.org, mob: 07866 006 934

**Is there support for me available if I am dealing with a safeguarding incident?**

As part of our duty of care to the colleague reporting a safeguarding incident, a phone call or a face-to-face meeting will be arranged within 72 hours of the incident. This will be made by the Safeguarding Team to ensure the colleague is ok and has access to any support that they need.

**Revision History**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Revision** | **Changes** | **Author** | **Approver** | **Date** |
| 1A | New document | Kate Gilbert | Nancy Doyle | 2015 04 10 |
| 2A | Reporting procedure amended | Cheryl Winter | Sandie Scrase | 2015 05 22 |
| 3A | Restructured social inclusion and in-work support | Sandie Scrase | Nancy Doyle | 2015 07 13 |
| 4A | Added radicalisation and PREVENT training. | Sandie Scrase | Fiona Barrett | 2016 06 30 |
| 5A | Updated safeguarding leads and prevent link | Marian Symons | Fiona Barrett | 2018 01 19 |
| 6A | Updated: legislation change.SI Lead | Fern Fuller | Fiona Barrett | 2018 11 05 |
| 7A | Review of policy | Dom Nally | Nancy Doyle | 2019 09 09 |
| 8A | Align policy to annual refresher training | Dom Nally | Fiona Barrett | 2020 03 10 |
| 9A | Appendix Types of abuse added | Dom Nally | Fiona Barrett | 2020 08 28 |
| 10A | Annual review of document | Dom Nally | Fiona Barrett | 2020 11 05 |
| 11A | Review of policy and addition of contact details | Marian Symons | Fiona Barrett | 2020 02 25 |
| 12A | New template, review of Policy/contact details  | N Maguire | Fiona Barrett | 2022 01 18 |
| 13A | Reviewed and changed names of leads | Fiona Barrett | Drew Goddard | 2023 01 24 |