

Document revision history

Document Reference	Version	Introduced/Changed by	Summary of changes	Approval date	Date for review
SG001	Version 3	Tracey Robinson	DSL Leads Updated Form information updated Other minor updates	3/01/2023	1/08/2023
SG001	Version 4	Elizabeth Lovatt	DSL Leads Updated	5/05/2024	1/01/2025
SG001	Version 5	Elizabeth Lovatt	DSL Leads Operation Encompass Low level concerns Other minor updates	21/11/24	01/05/2025
SG001	Version 6	Elizabeth Lovatt	Updated key links and documents to reflect correct year Added Medical arrangements	01/05/2025	09/10/2025

Safeguarding Contact Details

If you have a concern, want to make a disclosure or need advice on an immediate basis, contact:

- ***Elizabeth Lovatt, Designated Safeguarding Lead 07525732774***
- ***Sue Carruthers, Deputy Designated Safeguarding Lead 07539470262***

You can also contact the following email address which should also be used to submit cause for concern forms:

- Email safeguarding@gen2.ac.uk

Additionally, there are Safeguarding Officers based at the following centres, who along with Student Services can be the first point of contact for safeguarding concerns:

- Carlisle – Graeme Barker and Joanne Hoggarth 01228 599890
- Furness – Jenna Wearing and Leanne Stilling 01229 483760
- **Energus – Graham Whittaker 01900 701300/01900 605665**

All causes for concern should be recorded on the 'Cause for Concern Form' which is available on SharePoint, in the Safeguarding Folder in the Document Management section. See section 4 of this policy for further information [LINK](#).

This policy applies to all learners and particularly those aged under 18 and/or vulnerable adults.

Gen2 is committed to promoting the welfare of children and vulnerable adults as defined in the Children Acts of 1989 and 2004 and Safeguarding Vulnerable Groups Act 2006 and uphold its legal responsibilities as a further education institution as defined in the Education Act 2002. Furthermore, Gen2 is committed to the statutory frameworks set out in Keeping Children Safe in **Education 2024 and Working Together to Safeguard Children 2023**.

Gen2 staff have an important role as they are in a position to identify concerns early, provide help for children and vulnerable adults and prevent concerns from escalating. It is the responsibility of all staff members to provide a safe environment in which children and vulnerable adults can learn. All staff members are expected to be aware of their duty to report concerns, the guidance for identifying child abuse, what to do if a child or a vulnerable adult makes an allegation of child abuse and issues about confidentiality.

1. Principles

Gen2 recognises that, for children and vulnerable adults who have been abused, or who are being subjected to abuse, our training centres may be the only stable and secure element in their lives. Gen2's Safeguarding policy and procedure is based on the following principles:

- an ethos that promotes a positive, supportive and secure environment where learners feel valued
- liaison with other agencies that support learners, such as social/children's services
- all allegations and suspicions of abuse are taken seriously, and responded to swiftly and appropriately.

There are five main elements to the policy:

- ensuring that Gen2 practices safe recruitment in checking the suitability of staff and volunteers to work with children and vulnerable adults
- raising awareness of child protection issues amongst staff
- developing and implementing procedures for identifying and reporting cases or suspected cases, of child abuse
- supporting the child or vulnerable adult who has been abused
- establishing a safe environment in which children and vulnerable adults can learn and develop, where they are able to talk and be listened to.

2. Definitions

Safeguarding is defined as the action that is taken to promote the welfare of children and vulnerable adults and protect them from harm.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have optimum life chances and enter adulthood successfully

Child Protection is a part of safeguarding and promoting welfare and refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

In this policy, a child is defined as anyone who has not yet reached their 18th birthday.

The Protection of Vulnerable Adults Scheme (PoVA 2004) defines a vulnerable adult as a person aged 18 or over who:

- Has need for care or support
- Is experiencing, or at risk of, abuse or neglect
- Is unable to protect themselves against significant harm or exploitation

3. Forms of Abuse

The Children Acts 1989 and 2004 define four types of abuse: physical, emotional, sexual and neglect.

Additionally, being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach the Human Rights Act 1998.

3.1 Physical Abuse

Physical abuse may take many forms e.g., hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating or otherwise causing physical harm to a child. It may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child or vulnerable adult. This unusual and potentially dangerous form of abuse is now described as fabricated or induced illness.

Possible signs of physical abuse include:

- | | |
|---|---|
| • Unexplained injuries or burns, particularly if they are recurrent | • Fear of medical help |
| • Refusal to discuss injuries | • Aggression/bullying |
| • Improbable explanations for injuries | • Over compliant behaviour or a 'watchful' attitude |
| • Untreated injuries or lingering illness not attended to | • Running away |

- | | |
|--|---|
| <ul style="list-style-type: none"> • Admission of punishment which appears excessive • Shrinking from physical contact • Fear of returning home or of parents being contacted • Fear of Undressing | <ul style="list-style-type: none"> • Significant change in behaviour without explanation • Deterioration of work • Unexplained pattern of absence which may serve to hide bruises or other physical injuries |
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3.2 Emotional Abuse

Emotional abuse is persistent emotional ill treatment causing severe and persistent effects on the child or vulnerable adult's emotional development and may involve:

- conveying the message that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person
- imposing developmentally inappropriate expectations
- causing the child or vulnerable adult to feel frightened or in danger – e.g., witnessing domestic violence
- exploitation or corruption of children or vulnerable adults

Some level of emotional abuse is involved in most types of ill treatment, although emotional abuse may occur alone.

Possible signs of emotional abuse include:

- | | |
|--|---|
| <ul style="list-style-type: none"> • Continual self-deprecation • Fear of new situations • Inappropriate emotional responses to painful situations • Self-harm or mutilation • Compulsive stealing/scrounging • Drug/solvent abuse | <ul style="list-style-type: none"> • 'Neurotic' behaviour – obsessive rocking, thumb-sucking, and so on • Air of detachment – 'don't care' attitude • Social isolation – does not join in and has few friends • Desperate attention-seeking behaviour • Eating problems, including overeating and lack of appetite • Depression, withdrawal |
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3.3 Sexual Abuse

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, whether or not they are aware of what is happening and includes penetrative and non-penetrative acts.

It may also include non-contact activities, such as looking at, or being involved in the production of pornographic materials, watching sexual activities, up skirting, suggestive remarks and innuendos, or encouraging children or vulnerable adults to behave in sexually inappropriate ways or grooming a child in preparation for abuse. Sexual abuse can take place online and technology can be used to facilitate offline abuse.

It also includes other contact activities such as groping, inappropriate touching, and other forms of non-consensual contact.

Possible signs of sexual abuse include:

- Bruises, scratches, burns or bite marks on the body
- Scratches, abrasions or persistent infections in the anal or genital regions
- Sexual awareness inappropriate to the person's age – shown, for example, in drawings, vocabulary, games and so on
- Frequent public masturbation
- Attempts to teach others about sexual activity
- Refusing to stay with certain people or to go to certain places
- Aggressiveness, anger, anxiety, tearfulness
- Withdrawal from friends
- Promiscuity, prostitution, provocative sexual behaviour
- Self-injury, self-destructive behaviour, suicide attempts
- Pregnancy – particularly in the case of young adolescents who are evasive concerning the identity of the father
- Recoiling from physical contact
- Eating disorders
- Tiredness, lethargy, listlessness
- Over-compliant behaviour
- Genital discharge/irritation
- Sleep disturbance
- Unexplained gifts of money
- Depression
- Changes in behaviour

3.4 Neglect

Neglect involves the persistent failure to meet basic physical and/or psychological needs, likely to result in serious impairment of the child or vulnerable adult's health and development. This may involve failure to provide adequate food, shelter or clothing, failure to protect from physical harm or danger or failure to ensure access to appropriate medical care or treatment. It may also include neglect of basic emotional needs.

Possible signs of neglect include:

- Constant hunger
- Poor personal hygiene
- Inappropriate clothing
- Frequent lateness or non-attendance at College
- Untreated medical problems
- Low self-esteem
- Poor social relationships
- Compulsive stealing or scrounging
- Constant tiredness

Other forms of abuse include:

- Bullying, including online bullying (cyberbullying) and prejudice-based bullying
- Racist, disability and homophobic or transphobic abuse
- Gender-based violence / violence against women and girls
- Radicalisation and / or extremist behaviour
- Modern day slavery
- Financial abuse
- Impact of new technologies on sexual behaviour e.g., 'sexting' or 'up skirting'
- Child sexual exploitation

Possible signs of financial abuse include:

- Loss of jewellery and personal property
- A bill not being paid when money is entrusted to a third party
- Unexplained withdrawal of cash
- Lack of money to purchase basic items
- Misuse of benefits
- Inadequate clothing
- Theft of property
- Over protection of money or property
- Loss of money from a wallet or purse

3.5 Child on Child abuse

All staff should be aware that children can abuse other children, often referred to as child on child (previously peer on peer abuse). This can be inside or outside of college and or online. We will endeavour to support victims; perpetrators and any other children are supported. We also recognise that even if there are no known cases, this may be a case of abuse not being reported.

Gen2 maintains a zero-tolerance approach to any form of bullying or child-on-child abuse, whether online and/or in person, including sexual harassment and violence, racist, sexist and homophobic (or any other trans-related phobias) behaviour and abuse.

Low-level disruption and the use of offensive language can in itself have a significant impact. This behaviour will be challenged and should not be dismissed as banter or horseplay and it can also lead to reluctance to report other behaviour

Child-on-child abuse may include, but is not limited to:

- bullying (including cyberbullying, prejudice- based and discriminatory bullying)
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm this may include an online element which facilitates, threatens and/or encourages physical abuse
- sexual violence, such as rape, assault by penetration and sexual assault may include an online element which facilitates, threatens and/or encourages sexual violence
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand alone or part of a wider pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude or semi-nude images and/or videos
- up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include online)

Child-child abuse will be managed in accordance with this policy.

3.6 Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Gen2 is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience domestic abuse. Operation Encompass means that the police will share information about domestic abuse incidents with Gen2 PRIOR to the start of the next school day when they have been called to a domestic incident.

<https://www.operationencompass.org/>

3.7 Children Missing/absent from Home, Care and Education

Staff should be aware that children going missing, particularly repeatedly, could be an early warning sign of a range of safeguarding possibilities. This may include abuse and neglect, may include sexual abuse or exploitation. There could be indicators of criminal exploitation including involvement in county lines.

It could also be an indication of mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour' –based abuse or of forced marriage. Early intervention is key and staff should report any absences or prolonged periods of absence to the DSL to prevent risks of children going missing in the future. Staff should be clear about the reporting of unauthorised absences or when a learner has not reported an absence on the day of training.

3.8 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This power imbalance may be due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources.

In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

It can involve force and/or enticement-based methods of compliance and may or may not be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

3.9 Serious Violence

All staff should be aware of indicators which may signal those children are at risk from, or are involved with serious violent crime. These indicators may include increased absence from Gen2 and their workplace, a change in friendships or relationships with older

individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity, drug networks or gangs groom and exploit children and vulnerable adults to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

3.10 Honour-based abuse (HBA)

Honour-based abuse includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community including female genital mutilation (FGM) and forced marriage. Abuse committed in these honour-based contexts often involves a wider network of family or members of the community.

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

3.11 Female Genital Mutilation (FGM)

The Female Genital Mutilation Act 2003 specific statutory duty on all staff members to report an act of FGM if they discover that such an act appears to have been carried out on a girl under the age of 18 to the police. FGM is illegal in the UK and is a form of child abuse with long-lasting harmful consequences.

3.12 Harassment

Harassment (as defined by Section 26 of the Equality Act 2010) includes unwanted behaviour or conduct which has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment because of, or connected to, one or more of the following protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and Civil Partnerships
- Pregnancy and Maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Under our definition, harassment included domestic violence and abuse (which can also involve control, coercion and threats) and stalking.

We would also consider harassment to include any incidents of physical violence towards another person(s) on the basis of a protected characteristic, and hate crimes, such as those criminal offences which are perceived by the victim or any other person, to be motivated by hostility or prejudice, based on a person's disability or perceived disability; race or perceived race; or religion or perceived religion; sexual orientation or perceived sexual orientation or transgender identity or perceived transgender identity.

3.13 Sexual misconduct

Sexual misconduct relates to all unwanted conduct of a sexual nature. This includes but is not limited to:

- Sexual harassment (as defined by Section 26 (2) of the Equality Act 2010)
- Unwanted conduct which creates an intimidating, hostile, degrading, humiliating or offensive environment (as defined by the Equality act 2010)
- Assault (as defined by the Sexual Offences act 2003)
- Rape (as defined by the Sexual Offences act 2003)
- Physical unwanted sexual offences (as set out by Equality and Human Rights commission: Sexual harassment and Law, 2017)
- Intimidation, or promising resources or benefits in return for sexual favours (as set out by the Equality and Human Rights Commission: Sexual harassment and the law, 2017)
- Distributing private and personal explicit images or video footage of an individual without their consent (as defined by the Criminal Justice and Courts Act 2015)

These definitions include harassment and sexual misconduct through any medium, including for example, online.

3.14 Mental Health

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect or other potentially traumatic childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

There are a number of Mental Health First Aiders across all Gen2 sites who staff and learners can make an appointment to see (contact details up in all centres).

3.15 Radicalisation

Children and vulnerable adults are vulnerable to extremist ideology and radicalisation. In respect of safeguarding individuals from radicalisation and preventing children and vulnerable adults from being drawn into terrorism, Gen2 is subject to the Prevent Duty under section 26 of the Counter Terrorism and Security Act 2015. Extremism is the vocal or active opposition to fundamental values, including democracy, rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Where deemed appropriate Gen2, seeks external support for learners through referrals to the Channel Programme. This programme aims to work with the individual to address their specific vulnerabilities, prevent them becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

If you believe you or someone you know are at risk or vulnerable to extremist ideology or radicalisation, contact the Safeguarding Team who will liaise with the Police's Prevent Team. Further information is available at [Prevent - Cumbria Constabulary](#)

Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- The individual becomes increasingly intolerant of more moderate views
- The individual expresses a desire/intent to take part in or support extremist activity
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology
- The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.

Other issues covered by Annex B – Keeping Children Safe in Education – in addition to issues outlined above, Annex B of Keeping Children Safe in Education also includes further detail on the following:

- Child abduction and community safety incidents
- Children and the court system
- Children with family members in prison
- Modern slavery and the National Referral Mechanism

4. Duty to Report

All members of the staff at Gen2, including full time, part-time, contractors and any staff involved in supervising learners in exams/assessments are responsible for safeguarding and promoting the welfare of children and vulnerable adults.

All staff have a duty to safeguard, be alert to signs of abuse and are trained to understand their responsibilities. Failure to comply with these responsibilities will be seen as a serious matter which may lead to disciplinary action. Staff are expected to:

- attend or complete safeguarding related training as required
- familiarise themselves with the Safeguarding Policy, associated procedures and [Part 1 of Keeping Children Safe in Education](#)
- safeguard and promote the welfare of children and vulnerable adults and
- report to the Designated Safeguarding Leads if they have concerns about a child or vulnerable adult

If a child or vulnerable adult discloses to any staff member that they (or indeed another child or vulnerable adult) have been, or are being abused/radicalised or have any concerns they must do the following:

DO

- **Do** make sure that the person is safe and consider whether there is an imminent risk of harm or criminal activity
- **Do** listen very carefully and calmly to what they tell you.

- **Do** take what is said seriously and accept what you are told.
- **Do** stay calm and talk reassuringly to the child or vulnerable adult that they have done the right thing in talking to you.
- **Do** guarantee confidentiality, but NOT secrecy
- **Do** tell them that you must pass this information on but that only those that need to know will be told. Tell them to whom you will report the matter.
- **Do** tell them that with their consent they can get help and support
- **Do** write down accurately using the person's own words.

DO NOT

- **Do not** panic.
 - **Do not** promise to keep things secret. You have a duty to refer a child or vulnerable adult who is at risk.
 - **Do not** lie or say that everything will be fine now that they have told.
 - **Do not** criticise the abuser, especially if it is a parent/carer
 - **Do not** ask lots of detailed or leading questions such as: 'What did he/she do next?' Instead, ask open questions such as: 'Anything else to tell me? 'Yes', or 'And...?'
 - **Do not** press for answers the student is unwilling to give.
- For immediate concerns all staff are expected to contact the Designated Safeguarding Team
 - **Elizabeth Lovatt, Designated Safeguarding Lead 07525732774**
 - **Sue Carruthers, Deputy Designated Safeguarding Lead 07539470262**

Additionally, there are Safeguarding officers based at the following centres, who along with Student Services can be the first point of contact for safeguarding concerns:

- **Carlisle – Graeme Barker and Joanne Hoggarth 01228 599890**
 - **Furness – Jenna Wearing and Leanne Stilling 01229 483760**
 - **Energus – Graham Whittaker 01900 701300/01900 605665**
- In all causes for concern, it is very important to record, as accurately as possible, what was said to you when you received the disclosure of abuse or what are the causes for concern. All written records should be handled confidentially and information recorded clearly. The **Cause for Concern Form MUST** be used in all cases and causes for concern. This should be completed immediately or in non-urgent cases, the earliest opportunity within the day. The safeguarding team will then determine next steps and will also take appropriate steps to ensure the safety of the learner, and any others who may be at risk.
 - If a child or vulnerable adult discloses to you that they or another child or vulnerable adult have been abused/radicalised, or if you suspect from what you observe that they are being abused, you **MUST REPORT THIS**. It is important to note that children may not feel ready or know how to tell someone they are being abused. Initial disclosures may come from nonverbal communication for example. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong.
 - It is important that the person to whom 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.

- Gen2 Staff should never give absolute guarantees of confidentiality to children and vulnerable adults wishing to tell them about something serious. They should however guarantee that they will only pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to protect the child/vulnerable adult.
- All records should be kept securely.

5. Designated Safeguarding Leads

Gen2 has two Designated Safeguarding Leads whose role it is to deal with cases of suspected abuse. You must inform any one of these staff immediately if you have concerns (even if you think they are low level concerns) that a child or vulnerable adult has been, or is, being abused or radicalised. They should be informed in person, or by telephone or (in extreme circumstances) by email. The designated team are supported by Student Services and the Safeguarding Coordinators at each centre.

Elizabeth Lovatt is the designated safeguarding lead, and **Sue Carruthers** is the deputy designated safeguarding lead and deal with safeguarding and Prevent issues.

Designated Safeguarding Leads are responsible for providing support, advice and expertise on safeguarding issues, and are responsible for dealing with allegations or suspicions of abuse. They attend training as appropriate, liaise with the Managing Director and programme managers in the other areas where necessary, and make referrals to external agencies. Other aspects of their role include:

- Overseeing the referral of cases of suspected abuse/radicalisation or allegations to the Local Authority, or other agencies (such as the police, Channel) as appropriate.
- Providing advice and support to other staff on issues relating to child /vulnerable adult protection
- Maintaining a proper record of any child/vulnerable adult protection referral, complaint or concern (even where that concern does not lead to a referral)
- Ensuring that parents/carers are aware of the Safeguarding Policy
- Liaising with the relevant Local Authority department and other appropriate agencies
- Liaising with employers and other organisations that receive children or vulnerable adults from Gen2 on long term placements to ensure that appropriate safeguards are put in place
- Ensuring that all staff receive basic training in child protection/vulnerable adult issues.
- obtaining information from staff, children, parents or carers who have concerns relating to the protection of children or vulnerable adults, and to record this information
- assessing information quickly and carefully and asking for further information where appropriate
- consulting with a statutory child protection agency e.g., the local social services department, to clarify doubts or worries
- making referrals to statutory child protection agencies or the police without delay
- Designated Safeguarding Leads have contact telephone numbers for the statutory agencies including the police or in cases of radicalisation for referring to the Channel Scheme as appropriate.

6. The Management Team

The Managing Director and Senior Management Team (SMT) are responsible for ensuring that:

- Gen2 Safeguarding policy and procedures are fully implemented and followed by staff
- Designated Safeguarding Leads (DSL) have sufficient time and resources to carry out their roles
- All staff feel able to raise concerns about the safety of children and vulnerable adults
- Concerns are dealt with sensitively, effectively and in a timely manner.
- Actions related to Prevent are identified and monitored if necessary
- Noting and challenging the Safeguarding reports at SMT

Information is also reported to Governors, Trustees and the Executive at C&G.

7. Allegations of Abuse Against Staff or Contractors

Allegations of abuse, or concerns raised against members of Gen2 staff or contractors, will always be treated seriously. The allegation must always be referred to one of the Designated Safeguarding Leads or the Managing Director who will follow the Safeguarding Procedure in the same way as for other safeguarding allegations ([see Duty to Report in section 4 above](#)).

The Designated Safeguarding Leads will take the appropriate steps to ensure the safety of the child or vulnerable adult, and any others who may be at risk. The Designated Safeguarding Leads will also inform the relevant Line Manager in order that Gen2 procedures may be followed, and a Disciplinary Investigation is carried out.

If the allegation or concern is against one of the Designated Safeguarding Leads, it should be reported to the Managing Director. Where there are concerns or allegations about the Managing Director, these should be referred to the Managing Director for Employer Solutions at City & Guilds.

Where there is a complaint against a member of staff there may also be criminal (police) investigations and/or a child/vulnerable adult protection investigation, carried out by Social Services.

Employers of supply staff or contractors will be informed if any concerns (low level or otherwise) are raised.

The Local Authority Designated Officer (LADO) is likely to be consulted.

7.1 non-recent allegations Where an adult makes an allegation to Gen2 that they were abused as a child, the individual will be advised to report the allegation to the Police. Non-recent allegations made by a child, will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with the LA Children's Social Care and the Police. Abuse can be reported no matter how long ago it happened.

7.2 Concerns and/or allegations that do not meet the harm threshold (low-level concerns)

As part of our whole Gen2 approach to safeguarding we aim to promote an open and transparent culture in which all concerns about all adults working in or on behalf of Gen2 (including supply staff, volunteers, contractors and external providers) are dealt with promptly and appropriately.

We believe that creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold), are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

If implemented correctly, this will encourage an open and transparent culture; enable us to identify inappropriate, problematic or concerning behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of Gen2 are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and values.

A low-level concern does not mean that it is insignificant. It is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of Gen2 may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the LADO.

All low-level concerns about adults working in Gen2, regardless of how insignificant they may be perceived to be, should be reported initially to the DSL/DDSL. Where the concern relates to the DSL/DDSL or in a situation where there is a conflict of interest in reporting the matter to the DSL/DDSL, the concern should be referred to the safeguarding Governor. Further information on low-level concerns, examples and record keeping can be found in the Gen2's staff code of conduct.

7.3 Responding to low-level concerns

If the concern has been raised via a third party, the DSL will collect as much evidence as possible by speaking directly to the person who raised the concern (unless it has been raised anonymously) and to the individual involved and any witnesses. Low-level concerns which are shared about supply staff, contractors and other external providers, where relevant, be notified to their employers/National Governing Body, so that any potential patterns of inappropriate behaviour can be identified

8. Arrangements in Cumbria for Reporting Cases

The Children and Social Work Act (2017)^[9] and Working Together to Safeguarding Children (2023), removed the statutory requirement for Cumbria to have a Local Safeguarding Children Board.

As a result, the statutory safeguarding partners in Cumbria:

- Cumberland Council
- Westmorland and Furness Council
- Cumbria Police
- Clinical Commissioning Groups – North Cumbria and Morecambe Bay

In consultation with the relevant agencies agreed the new multi-agency safeguarding arrangements for Cumbria as set out in the [Children and Social Work Act \(2017\)](#)

The purpose of CSCP is to support and enable local organisations and agencies to work together in a system where:

- Children are safeguarded and their welfare promoted;
- Partner organisations and agencies collaborate, share and co-own the vision for how to achieve improved outcomes for vulnerable children;
- Organisations and agencies challenge appropriately and hold one another to account effectively;
- There is early identification and analysis of new safeguarding issues and emerging threats;
- Learning is promoted and embedded in a way that local services for children and families can become more reflective and implement changes to practice;
- Information is shared effectively to facilitate more accurate and timely decision making for children and families.

9. Welfare Support

Gen2 offers learners and staff an independent counselling service. Furthermore, learners and staff may be referred to one of our qualified Mental Health First Aiders.

Gen2 has facilities to serve as prayer rooms or faith-related facilities and accommodate individual needs.

Learners are able to access wellbeing support via Student Services.

Further information is available at [Supporting our Learners - Gen2](#)

10. External Speakers & Events

A risk assessment should be undertaken by the relevant Centre Manager prior to hosting an external speaker or open event. The risk assessment should consider whether the views expressed or likely to be expressed would constitute inappropriate or extremist views and materials that could draw people into terrorism. In these cases, the event must not be allowed to go ahead and should be cancelled. The risk assessment would clearly identify what mitigating actions are required. External speakers must be escorted by a staff member during the entirety of their visit to our centers. They may also be required to provide a reference/Disclosure and Barring Service (DBS) certificate upon request.

Open events taking place in centers and any planned events held off-site, organised by Gen2, must also be risk assessed.

11. Distribution & Publication of Extremist Materials

Staff and learners must not promote or distribute extremist literature or other media materials likely to incite radicalisation, racial or religious hatred or acts of violence. Staff and learners must not distribute or publicise or use any platform to share or display materials that may cause discrimination or stress to others, offensive, indecent or obscene material.

The distribution and publication of images or videos that contain material relating to radicalisation and extremism themes or are of an offensive, indecent or obscene nature is prohibited.

12.1 First Aid Arrangements

A DBS is carried out for all First Aiders, regardless of their role at Gen2, as they may be required to administer First Aid to a child or vulnerable adult while attending Gen2.

First Aid is the immediate care given to a person who has been injured, or who has become ill prior to the arrival of qualified medical assistance. The most important role of a first aider is to ensure that the aims of first aid are put into practice in an emergency.

It is vital to have gained consent from the patient before providing first aid. The first aider must introduce themselves, tell the patient they are a first aider and ask if they can help them. It is important for the first aider to maintain communication with a patient while providing first aid. This should involve informing the patient what the first aider is going to do, why they need to do it and ask if it is okay for them to do it. If a first aider needs to make physical contact with a patient, then the first aider must tell them what they need to do and why and ask them if it is okay to do so. Consent is a continual process and therefore this communication must be continually maintained while providing first aid treatment.

Consent can be implied, for example where a patient is unconscious, a first aider must still introduce themselves and ask for the patient's permission to help them. If the patient cannot reply it is assumed that they would want a first aider to help. However, the first aider must still ask to rely on implied consent. If the patient becomes conscious the first aider must ask them again for permission to help.

If a patient cannot respond verbally, for example if they are choking and cannot speak, they could nod to confirm their consent, or if the patient stretches out their hand this may also be deemed to be consenting.

12.2 Medical Arrangements;

All learners are to complete a medical capture document prior to starting their programmes. Risk assessment are then completed and carried out for each applicable learner and medical health care plans are completed where required. All documents are signed and shared with relevant and appropriate staff and where applicable employers.

Where required additional training will be given for applicable staff where medication needs to be administered.

All First Aid personal, department managers and prime delivery teams and employers, will have access to all relevant medical information and instruction to support learners where needed to ensure safeguarding of learners at all times.

13. Health & Safety Vetting

The employer has the primary responsibility for the health and safety of the learner and should be managing any significant risks. As the training provider, Gen2 should take reasonable steps to ensure that the employer is doing this. Gen2 aims to undertake a Health & Safety Vetting Check with the employer before the learner starts their programme and carry out annual reviews or early where required.

14. Online Safety

Staff, learners and contractors are required to adhere to Gen2's policies and procedures relating to online safety. Gen2 has the following IT policies which are given to staff and learners during their induction programme when they start at Gen2:

- Acceptable Use of Internet and IT Services Policy
- Email and Electronic Communication Policy
- Social Media Policy

In addition, learners are provided with an IT Induction Guidebook and are required to complete an Internet Safety course during induction.

It is the responsibility of all staff and learners to report any abuse of the email or electronic communication systems which they become aware of. Any individual found to have failed to report abuse may result in subsequent disciplinary action.

Impero is used as a monitoring/filtering system and alerts are monitored and followed up on if necessary by delivery staff following initial notification from the safeguarding team.

Others at Gen2, particularly SLT are responsible for procuring filtering and monitoring systems, documenting decisions on what is blocked or allowed and why; reviewing the effectiveness of the provision and overseeing reports. SLT are also responsible for ensuring that all staff understand their role; are appropriately trained; follow policies, processes and procedures and act on reports and concerns in a timely manner.

In order to achieve the above, we will work closely with our IT Department to meet the needs of the school. Further guidance and information on how Gen2 are meeting the DfE Filtering and monitoring standards can be found in the school Online Safety Policy and Procedures,

Our learners can be exploited and suffer bullying through their use of technology e.g., the internet, mobile phones, and social networking sites. To minimise the risks to our learners we will ensure that, as outlined above, we have appropriate and reasonable security filters and monitoring systems in place.

15. Data Protection

The Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent or limit the sharing of information for the purposes of keeping children and vulnerable adults safe. Concerns or fears about sharing information must not stand in the way of the need to promote the welfare and protect the safety of children and vulnerable adults.

16. Safe Recruitment of Staff

Gen2 undertakes Safer Recruitment procedures to ensure staff are fit to work in our learning environments with children and vulnerable adults.

Gen2 has systems in place to prevent unsuitable people from working with children or vulnerable adults and to promote safe practice. We also reserve the right to refuse to employ staff who we believe may pose a risk to our learners. During the selection process, gaps in an application are explored and relevant questions are asked in interview to determine suitability.

All new staff and require the following checks to be made on appointment:

- at least one professional reference, (satisfactory to Gen2 and from a previous employer) and obtained by the HR team.
- documentary evidence checks to confirm nationality, residency and "right to work" status
- Enhanced DBS Disclosure or Enhanced DBS with Barred Lists Check *
- documentary evidence of qualifications
- satisfactory completion of the probationary period as defined in their letter of appointment
- staff members involved in the recruitment process must have completed relevant training

*The Further Education (Providers of Education) England Regulations 2006 place a duty on colleges and work-based learning providers to undertake an Enhanced Disclosure for all new staff providing education, training or care to children or vulnerable adults. An Enhanced Disclosure is carried out for staff who regularly care for, supervise, train or are in sole charge of children or vulnerable adults and First Aiders.

For individuals who have lived outside of the UK, further checks are carried out, where appropriate, if a DBS Disclosure is not felt to be sufficient to establish suitability to work with children, young people or vulnerable adults.

In accordance with the Regulations, records of all checks carried out are kept centrally by the Human Resources (HR) Team. The Gen2 recruitment process including safer recruitment information is available in the Recruitment Policy.

17. Disclosure and Barring Service

For some appointments, an enhanced DBS check with barred list information will be appropriate as the majority of staff will be engaging in regulated activity as defined in Schedule 4 to the Safeguarding Vulnerable Groups Act 2006. Employers can check the criminal record of someone applying for a role. This is known as getting a Disclosure and Barring Service (DBS) check. The Disclosure and Barring Service helps employers make safer recruitment decisions each year by processing and issuing DBS checks for England, Wales, the Channel Islands and the Isle of Man. There is a mandatory requirement for contractors who engage in regulated activity to complete a DBS check.

DBS also maintains the adults' and children's Barred Lists and makes considered decisions as to whether an individual should be included on one or both of these lists and barred from engaging in regulated activity. When the DBS has completed its check, a DBS certificate will be sent to the applicant. The applicant must show the certificate to the HR Officer before they can take up the post or as soon as practicable afterwards. Where an applicant is allowed to start work in regulated activity before the DBS certificate is available, Gen2 will ensure that the individual is appropriately supervised. Gen2 require renewals of DBS checks every 3 years.

18. Staff Training and Development

All staff and contractors who come into direct contact with learners must undertake training on the subject of safeguarding and Gen2's procedures. This Safeguarding Policy, procedure and accompanying guidance will be issued to all new staff as part of their induction and when updated and revised will be re-issued to all staff with updates communicated as necessary usually via briefings. All staff are expected to complete online training for Safeguarding and Prevent bi annually.

19. Staff Resignations

If, during the course of an investigation relating to safeguarding, an employee tenders his or her resignation, or ceases to provide their services, Gen2 is not prevented from following up an allegation in accordance with these procedures. Every effort will be made to reach a conclusion in cases relating to the welfare of children or vulnerable adults, including those where the person concerned refuses to co-operate with the process.

20. Support for Staff

Gen2 is aware that safeguarding cases can be distressing and that staff who have been involved may find it helpful to talk about their experiences, in confidence, with our Designated Safeguarding Officers.

Gen2 also have a company counsellor who can be contacted confidentially, and the service is free to both staff and learners.

21. Trustee/Governor

All Trustees/Governors receive training on safeguarding, prevent and British Value. This training is renewed at regular intervals.

Safeguarding is reported at the Gen2 governance board and to the Trustees.

22. Equality & Diversity

All children and young persons and vulnerable adults, as part of our wider, have the right to be safeguarded from harm and exploitation whatever their protected characteristic e.g., race, religion or belief, gender reassignment, sex, age, sexual orientation, marriage/civil partnership status, pregnancy/maternity status or disability. This policy relates to Gen2's legal obligation to protect children and vulnerable adults who are suffering forms of abuse as defined in the Children Acts of 1989 and 2004 and is therefore in line with the Gen2's equality and diversity policy statement.

Gen2 has equalities lead and they and other staff are available for staff and learners to speak to out any equality concerns.

23. Standards & Expectations

Safeguarding is Standard Two and fundamental British Values is Standard Five in Gen2's Standards & Expectations. Every staff member, learner and contractor is provided with a copy of Gen2's Standards & Expectations setting out our core values and beliefs in promoting a positive and professional culture, whilst aiming to promote excellence in behaviour and conduct to improve human performance. Promoting safeguarding and fundamental British Values play a critical role in achieving this.

Additionally, all employees are expected to complete the Safeguarding Code of Conduct from when they start employment.

24. Wearing ID Badges

All staff, contractors and visitors at Gen2 are required to sign in at reception upon arrival and must wear an identity badge / visitor's pass while attending a Gen2 centre.

Learners must be registered at the start of every lesson. All staff and learners are expected to wear an ID badge while attending a Gen2 centre. ID badges will be issued to staff at the start of their employment and learners will be issued with a badge during their induction programme. Any staff member or learner who is not wearing an ID badge should be challenged by Gen2 staff and requested to either retrieve their badge immediately or report directly to reception to be issued with a replacement badge.

25. Documentation

City & Guilds

City & Guilds have a Safeguarding Oversight Policy in place which is available at <https://cityandguilds.sharepoint.com/teamsite/supportservices/legal/Documents/Safeguarding/Safeguarding%20Oversight%20Policy%20v1.0.pdf>

Government Guidance

- Keeping Children Safe in Education (September 2023)
- Working Together to Safeguard Children (December 2023)
- Prevent Duty Guidance: for Further Education institutions in England & Wales

Gen2 Forms

- Safeguarding / Cause for concern Referral Form SG002
- Channel Referral Form HR080A
- Health & Safety Vetting Form HS075

Related Gen2 policies and procedures

- Dignity at Work Policy
- Lone Working Policy & Procedure
- IT policies

26. Quality Assurance Monitoring Procedure

Monitoring of this procedure will be captured through statistical reporting of incidents, lessons learned and updated guidance or best practise as required.

Appendix A

Dedicated email – safeguarding@gen2.ac.uk

Designated Safeguarding Lead

Elizabeth Lovatt Head of Operations

t: 01900 701300

m: 07525732774

e: Elizabeth.lovatt@gen2.ac.uk

Deputy Designated Safeguarding Lead

Sue Carruthers Wellbeing & Pastoral Support Lead

t: 01900 701300

m: 07539470262

e: sue.carruthers@gen2.ac.uk

Safeguarding Officers

- Carlisle – Graeme Barker and Joanne Hoggarth 01228 599890
- Furness – Jenna Wearing and Leanne Stilling 01229 483760
- Energus – Graham Whittaker 01900 701300/01900 605665

Other Agencies

Children

Cumbria Safeguarding Children Partnership

[What to do if you have concerns about a child: \(cumbriasafeguardingchildren.co.uk\)](http://cumbriasafeguardingchildren.co.uk)

Cumberland Safeguarding Hub

Telephone Number 03332401727

Email safeguarding.hub@cumberland.gov.uk

Westmorland and Furness Safeguarding Hub

Telephone Number 03003732724

Email safeguarding.hub@westmorelandandfurness.gov.uk

Early Help consultancy, advice and guidance for families in Cumberland: 03003 033 896.

Early Help consultancy, advice and guidance for families in Westmorland and Furness: 0300 373 2723.

The paperwork you use for Early Help is accessed via the CSCP website: <https://www.cumbriasafeguardingchildren.co.uk/earlyhelp.asp>

Cumbria LADO service continues to cover both local authority footprints - Cumberland and Westmorland and Furness.

If you have concerns regarding someone who works with a child including foster carers and volunteers these should be reported to the Local Authority Designated Officer (LADO). This applies to all paid, unpaid, volunteers, casual, agency employees or anyone working in a self-employed capacity.

Information on LADO including how to contact and the referral form is accessed via the CSCP website: <https://www.cumbriasafeguardingchildren.co.uk/professionals/lado.asp>

- Tel: 03003 033892
- Fax: 01768 812090
- Email: lado@cumbria.gov.uk
- Post: LADO, Cumbria Safeguarding Hub, Skirsgill Depot, Penrith, Cumbria, CA10 2BQ

Cumbria Safeguarding Children Partnership

Cumbria is maintaining a single safeguarding children partnership which covers both new local authorities.

Professionals continue to access learning and development, partnership resources and multi-agency policies and procedures from Cumbria Safeguarding Children Partnership.

<https://www.cumbriasafeguardingchildren.co.uk/>

CSCP@cumbria.gov.uk

Adults

Cumberland Council

If you have concerns that an adult is at risk of abuse or neglect in **Cumberland** you should contact the Cumberland Council Single Point of Access line on **0300 373 3732**.

Westmorland & Furness Council

If you have concerns that an adult is at risk of abuse or neglect in **Westmorland & Furness Council** you should contact the Westmorland & Furness Council Single Point of Access line on **0300 373 3301**.

Cumbria Safeguarding Adults Board

The arrangements for Cumbria Safeguarding Adults Board continues to be countywide covering all of Cumbria.

Professionals receive information, resources and multi-agency policies and procedures from Cumbria Safeguarding Adults Board.

www.cumbriasab.org.uk

CSAB@cumbria.gov.uk

Hospitals/Accident & Emergency Services

- Cumberland Infirmary, Newtown Rd, Carlisle, Cumbria CA2 7HY
Tel: 01228 523444
- West Cumberland Hospital, Homewood, Hensingham, Whitehaven, Cumbria CA28 8JG
Tel: 01946 693181
- Furness General Hospital, Dalton Lane, Barrow-In-Furness, Cumbria LA14 4LF
Tel: 01229 870870
- Workington Community Hospital, Park Lane, Workington, Cumbria, CA14 2RW
Tel: 01900 705000
- Carleton Clinic, Cumwhinton Drive, Carlisle, Cumbria CA1 3SX
Tel: 01228 602000
- Hopegill Centre, 25, Banklands, Workington, Cumbria CA14 3EU
Tel: 01900 324200
- Morecambe Bay Hospitals NHS Trust
Tel: 01539 732288
- Stanley St, Ulverston, Cumbria LA12 7BT
Tel: 01229 484045

Disclosure & Barring Service (DBS):

- telephone - 03000 200 190
- [webchat](#)
- email - customerservices@dbb.gov.uk

National Society for the Prevention of Cruelty to Children (NSPCC):

42, Curtain Rd, Shoreditch, London, EC2A 3NH

Tel: 0808 8005000

Police:

Durrant Industrial Estate, Brunel Way, Carlisle CA1 3NQ

Tel: 0845 330 0247

Scotch St, Whitehaven, Cumbria CA28 7NN

Tel: 0845 330 0247

Hall Brow, Workington, Cumbria CA14 4AP

Tel: 0845 330 0247

Market St, Barrow-In-Furness, Cumbria LA14 2LE

Tel: 0845 330 0247

Channel (Prevent)

prevent@cumbria.police.uk

UK National Drugs Helpline

Tel: 0800 776600

Useful Web Site Addresses

Sexual Health (Cumbria & Lancashire) www.clashonline.co.uk

Sexual Health; Drug Abuse; Alcohol; etc. www.ypsh.net Tel: 0800 282930

Sexual Health www.likeitis.org

Sexual Health www.brook.org.uk

Eating disorders	www.b-eat.co.uk	
Drug Abuse	www.talktofrank.com	Tel: 0800 776 600
Drug Abuse	www.addictionadvisor.co.uk	Tel: 0845 033 8909
Alcohol Issues	www.alcoholissues.co.uk	
Alcohol; Drug Abuse; Eating Disorders	www.recovery.org.uk	
Substance Abuse	www.rehabguide.co.uk	Tel: 0844 800 7175

Designated Person Flowchart Handout

