



KMP – 002 GHL Safeguarding Policy

GHL SAFEGUARDING POLICY

Scope

Safeguarding means:

- Protection from abuse and neglect
- Promotion of health and development
- Ensuring safety and care
- Ensuring optimum life chances

PREVENT DUTY:

The UK Government's counter-terrorism strategy, defined as:

- *Stopping people becoming or supporting terrorists or violent extremism.*
- *Violent extremism in the name of ideology or belief is defined as violence, incitement to violence, terrorism, incitement to terrorism, or other activities that may result in violent behaviour or terrorist activity in the name of an ideology or a set of beliefs.*

An integral element of GHL's Safeguarding ethos is encouraging students to respect the Fundamental British Values of:

- democracy
- the rule of law
- individual liberty and mutual respect
- tolerance of those with different faiths and beliefs

(see [KMP 036](#) for GHL full Policy on PREVENT)

This Policy is promoted within the GHL website, Learner handbooks and a copy is held in all classrooms used. Every employee has access to the policy via the company Sharepoint site and it is a requirement of all employees to ensure they have read and understood the policy. The company has a mandatory requirement that all employees complete an online safeguarding test at least every three years, certificates are held centrally.

The policy is approved and endorsed by the senior management team and is reviewed annually or when legislation demands.

Group Horizon Ltd recognises that members of staff and learners have a role to play in safeguarding the welfare of young people and vulnerable adults, and preventing their abuse. This policy focuses on protection from abuse and neglect and is designed to provide a basic procedure which should be followed in the circumstances defined below.

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Definitions

Abuse

Abuse is behaviour towards a person that either deliberately or unknowingly causes a person harm, or endangers their life or their human or civil rights. It can be passive, e.g. failing to take action to care for someone, or failing to raise the alert about abuse; or active, e.g. hitting, stealing or doing something that causes harm. Abuse can be a one-off or something that is repeated.

The commonly recognised forms of abuse are Physical, Sexual, Financial, Psychological, Discriminatory, Neglect or acts of omission, Organisational, Self Neglect, Domestic Abuse and Modern Slavery.

- **Financial or material abuse** - including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- **Physical abuse** - including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- **Neglect and acts of omission** - including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Sexual abuse** - including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the adult has not consented or was pressured into consenting.
- **Psychological abuse** - including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks
- **Organisational abuse** - including neglect or poor care practice within an organisation or specific care setting, such as a hospital or care home. It can also be in relation to care provided in your own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.
- **Discriminatory abuse** - including forms of harassment, slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.
- **Self neglect** - this covers a wide range of behaviour such as neglecting to care for your personal hygiene, health or surroundings and includes behaviour such as hoarding.

- **Domestic abuse** - including psychological, physical, sexual, financial, emotional, or so-called 'honour' based violence.
- **Modern slavery** - encompasses slavery, human trafficking, forced labour and domestic servitude. Trafficking and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

In the case of Adults at risk it may also include:

Physical abuse such as pushing, shaking, inappropriate restraint, force-feeding, forcible administration of medication, neglect or abandonment

Financial abuse such as exerting improper pressure to sign over money from pensions or savings etc

Children and young persons

In terms of this policy, 'child, children and young people' mean those under the age of 18 as defined by the Children Act 1989. This policy applies to students in this age group attending a training course, Traineeship or Apprenticeship.

Vulnerable adults

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited. The Care Act 2014¹ covers the following:

- What is adult safeguarding and why it matters;
- What are abuse and neglect?
- recognising the different types and patterns of and the circumstances in which they may take place;
- criminal offences and adult safeguarding;
- What is the local authority's safeguarding role?
- Adult safeguarding procedures including multi-agency working;
- Carrying out safeguarding enquiries;
- Safeguarding and advocacy;
- The role of Safeguarding Adults Boards;
- Safeguarding Adults Reviews;
- Sharing information;
- Roles responsibilities and training of local authorities, NHS and the police;
- Protecting property for adults being cared for away from home.

¹ More information on the Care Act 2014 can be obtained from the HR Manager by emailing:karen.nichols@grouphorizon.co.uk

This may include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance misuser
- Is homeless

This also applies to temporary conditions.

Legal requirements

The Department for Education has published the new Keeping Children Safe in Education 2016. This statutory guidance comes into force on 5th September 2016. The changes are not dramatic, but there are some areas that have greater emphasis than in the past.

Although the Government chose not to make PSHE statutory, it is clearer in Keeping Children Safe in Education 2016, that Governing Bodies 'should ensure' children are taught about safeguarding...as part of providing a broad and balanced curriculum.

All employees and associates are issued with 'Keeping Children safe in Education 2016'



Keeping_Children_Safe_in_Education__3

In March 2015, the Department for Education brought out new guidance for people working with children in England, Working Together to Safeguard Children (2015).

This guidance updates the previous version, Working Together to Safeguard Children (2013). Although not a major review, the 2015 guidance includes changes around:

how to refer allegations of abuse against those who work with children;

clarification of requirements on local authorities to notify serious incidents; and

the definition of serious harm for the purposes of serious case reviews.

The 2015 guidance also incorporates legislation and statutory guidance published since 2013.

Modern Slavery Act 2015

The Homes and Communities Agency ("HCA") is the government's housing, land and regeneration delivery agency, and the regulator of social housing providers in England.

The Modern Slavery Act will give law enforcement the tools to fight modern slavery, ensure perpetrators can receive suitably severe punishments for these appalling crimes and enhance support and protection for victims. It received Royal Assent on Thursday 26 March 2015.

The act will:

- consolidate and simplify existing offences into a single act
- ensure that perpetrators receive suitably severe punishments for modern slavery crimes (including life sentences)
- enhance the court's ability to put restrictions on individuals where it's necessary to protect people from the harm caused by modern slavery offences
- create an independent anti-slavery commissioner to improve and better coordinate the response to modern slavery
- introduce a defence for victims of slavery and trafficking
- place a duty on the secretary of state to produce statutory guidance on victim identification and victim services
- enable the secretary of state to make regulations relating to the identification of and support for victims
- make provision for independent child trafficking advocates
- introduce a new reparation order to encourage the courts to compensate victims where assets are confiscated from perpetrators
- enable law enforcement to stop boats where slaves are suspected of being held or trafficked
- require businesses over a certain size to disclose each year what action they have taken to ensure there is no modern slavery in their business or supply chains

Policy statement

The purpose of this policy is to promote wellbeing, prevent harm and respond effectively if concerns are raised.

Group Horizon Ltd is committed to working together with its funding partners and to complying with their procedures. It applies to all staff employed by Group Horizon Ltd including temporary and hourly paid, agency staff, non-executive directors and volunteers. All have a legal responsibility to take seriously any concerns about neglect or abuse that come to their attention and to follow the procedures set out below.

Students who have concerns about other students or the behaviour of adults towards them

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can use this policy to ensure they are taken seriously.

It is not Group Horizon Ltd.'s responsibility to investigate abuse. Nevertheless, it has a duty to act if there is a cause for concern and to notify the appropriate agencies so that they can investigate and take any necessary action. Any suspicion, allegation or incident of abuse must be reported to a Group Horizon Ltd designated person with responsibility for safeguarding as soon as possible and in any event within two hours.

Group Horizon Ltd will appoint a member of the Senior Management Team to lead on safeguarding, who will normally be the primary point of contact with the relevant Safeguarding Board. This person, who will also be a nominated person, is hereafter referred to as the Safeguarding lead.

The Safeguarding lead is the HR Manager and is responsible for ensuring:

That based on a risk assessment, there is a sufficient number of trained and competent staff with designated responsibility for safeguarding (the safeguarding team)

An annual action plan, to include a training programme, is drawn up and implemented if required.

That relevant information and material is effectively communicated to staff

Group Horizon Ltd will operate safe recruitment procedures and ensure that appropriate checks are carried out on all new staff, associates and volunteers.

The Policy Statement is reviewed at Board Level annually.

Procedures

Generalⁱ

Group Horizon Ltd takes seriously its duty of pastoral care and will be proactive in seeking to prevent young persons and adults at risk becoming the victims of abuse or neglect. It will do this in a number of ways:

- Through the creation of an open culture which respects all individuals' rights and discourages bullying and discrimination of all kinds including cyber-bullying.
- By identifying a member of the SMT who will lead and have overall responsibility for safeguarding young people.
- By informing young people of their rights to be free from harm and encouraging them to talk to Group Horizon Ltd staff if they have any concerns
- Throughout all programmes and an on-going programme of support, at an appropriate level, to promote self-esteem, social inclusion and address the issue of safeguarding children and young people in the wider context
- GHl is committed to ethical practices and therefore as a company we will:
 - Condemn modern slavery and human trafficking.
 - Be dedicated to ensuring that modern slavery does not take place at any point during our business or supply chains.

- Have a zero-tolerance attitude towards Human Trafficking and slavery
- Monitor the risk regarding slavery and human trafficking within our business.
- Take steps to mitigate the risks

Reporting procedures

Note: for allegations against a member of staff – see below.

For reporting procedures referring to the PREVENT Duty – see KMP 036.

If the allegation or suspicion of abuse is discovered or disclosed by a student then they should inform a member of staff as soon as possible. The member of staff will then inform the safeguarding lead as well as their line manager.

A member of staff discovering an allegation or suspicion of abuse will, similarly, report it to the safeguarding lead as well as their line manager.

The member of staff should make a written record (see relevant section below) of the allegation or suspicion of abuse and discuss the situation with the safeguarding lead. The safeguarding lead or designated manager will carry out a risk assessment and contact the local Social Services team if appropriate.

If a student/staff member has been told about the allegation of abuse in confidence, they should attempt to gain the consent of the student to make a referral to another agency. However, the gaining of the consent is not essential in order for information to be passed on. Consideration needs to be given to:

- The scale of the abuse
- The risk of harm to others
- The capacity of the student to understand the issues of abuse and consent

If there is any doubt about whether or not to report an issue to Social Services then it should be reported.

In emergency situations (e.g. where there is the risk or occurrence of severe physical injury), where immediate action is needed to safeguard the health or safety of the individual or anyone else who may be at risk, the emergency services must be contacted.

Where a crime is taking place, has just occurred or is suspected, the police must be contacted immediately.

Allegations against a member of staff

Record in full, as soon as possible, the nature of the allegation and any other relevant information.

Report the allegation/incident to a Group Horizon Ltd designated person as soon as possible and within two hours.

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Inform the safeguarding lead or a Director if lead not available.

Ensure the safety of the young person in question and any others who may be at risk.

Report the matter to social services. Consideration will be given on whether the member of staff should be suspended on full pay pending the investigation. Directors in conjunction with the Manager of Human Resources will be responsible for any decisions on suspension. Any suspension will follow Group Horizon Ltd procedures. The length of any suspension will be in line with Group Horizon Ltd policies and will be as short as is possible while ensuring the safety of the child.

Suspension should not necessarily be an automatic response to an allegation and all allegations should be dealt with quickly, fairly and consistently.

DBS checks

All existing, newly recruited staff and volunteers who have contact with students are DBS checked under arrangements made by Human Resources.

Please refer to the Health and Safety Policy for students on work placement.

Group Horizon Ltd designated persons

The Safeguarding lead is responsible for ensuring that there are sufficient designated persons with responsibility for safeguarding,

Group Horizon Ltd designated persons will be informed of all reported case of suspected abuse and will normally meet at least twice each year to review cases, share best practice and prepare a report for the Board (If applicable)

Responding to an allegation

Any suspicion, allegation or incident of abuse must be reported to a Group Horizon Ltd designated person with responsibility for safeguarding as soon as possible and in any event within two hours. If after careful assessment the designated person considers that there is reasonable cause to suspect abuse they must, as a matter of urgency, discuss the matter with the relevant funding partner (safeguarding lead) or Social Services Manager, the Duty Social Worker or the Police Service Child Protection Unit to determine whether it is a child protection matter. In making the assessment the designated person should refer to the guidance.

If it is agreed to be a safeguarding matter a written record of the date and time of the report shall be made and the report must include the name and position of the person to whom the matter is reported.

The designated person shall discuss with the relevant funding partner (safeguarding lead) or Social Services department what action should be taken to inform the parents of the student or child, unless to do so would put the young person or child at risk. A note of that conversation should be made.

Where in exceptional circumstances a member of staff deems there to be an immediate risk to a

young person and it is not possible to contact a Group Horizon Ltd designated person or the Director within the same day, s/he shall report the matter – normally by telephone directly to the local Social Services Department, Duty Social Worker or Police Service Child Protection Unit.

The staff member shall notify the Group Horizon Ltd designated person and Director as soon as possible and normally within one working day of the action taken and submit a written report of that action and the circumstances leading to it.

Written records

The relevant Group Horizon Ltd designated person shall retain a copy of the report; any notes, (including handwritten notes and any other recording along with a timeline) memoranda or correspondence dealing with the matter; and any other relevant material. Copies of reports, notes etc should be kept secure at all times.

The member of staff who has cause for concern shall make a full record as soon as possible.

The record should include the nature of the allegation and any other relevant information including:

- Date, time and place where the alleged abuse occurred
- Names of others present
- Name of the complainant and, where different, the name of the young person who has allegedly been abused
- Nature of the alleged abuse
- Description of any injuries/incidents observed
- The account which has been given of the allegation

A copy of all documentation is to be held centrally by the Safeguarding lead.

Confidentiality

Staff must not under any circumstances discuss or disclose information to any person other than those immediately involved in the case or as necessary according to the policy.

Training

The HR Manager is to ensure that a programme of training and staff development is in place to meet the requirements of the guidance. This should include suitable induction and updating.

Monitoring

The Safeguarding lead is responsible for ensuring that regular reports are made to the Board. The monitoring must include all subcontracted partners. (If applicable)

Guidelines on risk assessment in relation to safeguarding vulnerable groups

Before embarking on any company activity that may involve staff or students (whether acting in a paid or unpaid capacity) working with members of a vulnerable group, it is advisable for a risk assessment to be conducted, part of which should cover safeguarding issues. The member of staff responsible for the activity should undertake the risk assessment which, as well as identifying risks to be mitigated or removed, also provides an opportunity to consider

and identify alternative working practices. There are no fixed rules on how a risk assessment should be carried out, although the following general principles should apply:

A standard risk assessment template is available see KMF -002a which you may adapt or modify to meet your requirements. A risk assessment is a careful examination of what, in your area of work, could cause harm to people so that you can assess whether you have taken enough precautions or should do more to prevent harm. Where appropriate, this process should include consideration of any risks that may occur involving vulnerable groups, both within the company and in settings outside the company, such as placements, field trips, summer schools, or open days where members of a vulnerable group are in our care.

By way of example, HR has developed a risk assessment checklist in relation to the admission of under-18s which is included as part of this guidance see KMF -002a.

Identify the nature, length, frequency, intensity and time of any contact with vulnerable groups

This is designed to help you identify the context within which the risks should be managed, in the areas of teaching or research, or student recruitment/widening participation activity. Identifying the different types of contact that staff or students may have with these groups should lead to consideration of where you might seek to minimise occasions where a single adult is in the company of a lone child, or adult in a vulnerable situation and where there is little or no possibility of the activity being supervised or observed by others. For this purpose, the terms 'frequently' and 'intensively' relate to the person doing the activity, not whether it is always with the same child or adult in a vulnerable situation.

Identify any potential risk areas and detail action to prevent the risk occurring

Once you have identified the risks you should consider how they might be mitigated or removed. For example, situations where there is only one member of staff or one student present with a lone child or adult in a vulnerable situation should be avoided where practicable. This part of the process may involve consideration of alternative working practice. For example, on occasions when a confidential interview or one to one meeting is necessary, it should be conducted in a room where the exit is clearly visible and, where possible, the door to the room is left open. Meetings with any student or employee under the age of 18 outside the normal teaching or working environment of the company should be avoided. Where such meetings cannot be avoided, another staff member should be informed that they are taking place and wherever possible ensure that more than one adult is present.

Record your findings

You should keep a copy of the risk assessment form on file for future reference or use and provide a copy to your HR Manager. It is good practice to review your assessment from time to time - annually is a good guide. You should initial and date the assessment when you review it.

ⁱ GHIL do not work with or engage at present with under 18-year olds