

2023

KMP 002 GHIL Safeguarding Policy



Policies and Procedures

GHL SAFEGUARDING POLICY

Aim of the Policy.

Group Horizon Ltd (GHL) is committed to ensuring all necessary steps are taken to protect from harm children, young people and vulnerable adults who participate in any of our training programs.

This document sets out the company's position, role, and responsibilities, and clarifies what is expected of our staff when working with vulnerable adults.

Everyone involved in training and education needs to understand the individual and collective responsibility they undertake when working vulnerable adults.

This policy applies to all GHL staff, volunteers, and Associates whether paid or unpaid. These staff members could be.

- Administration staff
- Tutors/Trainers/Assessors/IQA
- Volunteers
- Associates
- Temporary Staff

It is essential that everyone is clear about how to report a concern about the welfare of a vulnerable adult. In short this means following the guidelines set out in this policy. Further support and guidance can be obtained through the designated safeguarding officers (DSO) (Simon Boagey and Karen Nichols)

All action is taken in line with the following legislation/guidance:

- Education regulations
- Equality Act 2010
- Data Protection Act (1998)
- Education Act 2002
- Counter Terrorism and Security Act 2015
- Safeguarding Vulnerable Groups Act (2006)
- Protection of Freedoms Act (POFA) (2012)
- Female Genital Mutilation Act (2013)
- Sexual Offences Act (2003)
- The Care Act (2014)
- The Equality Act (2010)
- The Mental Capacity Act (2010)
- National PREVENT strategy with guidance and advice regarding Radicalisation

- Information sharing - advice for practitioners providing safeguarding services parents and carers 2015

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 GH'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 GH's full Policy on PREVENT)

This Policy is promoted within the GH 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.

Definitions

Abuse

The company recognises that the terms 'vulnerable adult,' 'abuse' and 'exploitation' are open to interpretation, so for the purposes of this policy, these are defined as follows.

A vulnerable adult is described as; 'a person aged 18 years or over, who is in receipt of or may need community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm'.

Abuse shall be defined as: 'a violation of an individual's human or civil rights by any other person or persons and, for the purposes of safeguarding vulnerable adults, shall include physical abuse, emotional abuse, sexual abuse, neglect and bullying.'

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.

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

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- The role of Safeguarding Adults Boards.
- Safeguarding Adults Reviews.
- Sharing information.
- Role's responsibilities and training of local authorities, NHS, and the police.
- Protecting property for adults being cared for away from home.

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 is 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.

What is Modern Slavery?

Someone is considered a victim of modern slavery if they are:

- forced to work - through coercion, or mental or physical threat.
- owned or controlled by an 'employer', through mental or physical abuse or the threat of abuse.
- dehumanised, treated as a commodity or bought and sold as 'property'.
- physically constrained or have restrictions placed on their freedom of movement.

Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude, and inhumane treatment.

Victims may be sexually exploited, forced to work for little or no pay or forced to commit criminal activities against their will. Victims are often pressured into debt-bondage and are likely to be fearful of those who exploit them, who will often threaten and abuse victims and their families.

All these factors make it very difficult for victims to escape.

Modern Slavery crimes are being committed across the UK and are taking place in many different sectors including factories, fields, brothels, nail bars and even within people's homes. There is no typical victim of slavery - victims can be men, women or children of all ages and nationalities.

Many victims are brought to the UK specifically, so they can be abused and exploited for the benefit of others. Some are tricked into believing they are simply paying others to facilitate their journey to the UK, or that they are being smuggled here. Many often do not find out that they are destined for a life of abuse and servitude until after they arrive. However, we also know a high number of victims are UK nationals, including children.

The true extent of modern slavery in the UK and globally is unknown, but the best estimates suggest that there are between 10-13,000 victims currently in the UK and up to 45,000,000 worldwide (Global Slavery Index 2016).

The reality is that it is happening around us, in our towns and cities, it could be happening right in front of your eyes.

- if you believe a person is being trafficked and is in immediate danger, you should call 999 straight away.
- you can also report suspicions of trafficking by calling 101 or visiting your local police station.
- you can also provide information to Crime stoppers anonymously on 0800 555 111.
- if you want to refer someone for accommodation support contact [The Salvation Army](#),

who run a 24-hour confidential referral helpline on 0300 3038151 available 24 hours a day, seven days a week?

Risk factors

Anyone regardless of age, gender, ethnicity, and sexuality, can be at risk of modern slavery. However, traffickers or modern slavery facilitators often target vulnerable individuals as they are easier to coerce. Particularly vulnerable groups include:

- poor people
- homeless people / missing from homes.
- alcoholics or drug addicts
- people who lack education
- children brought up in social care.
- mentally and/or physically ill people
- victims of domestic violence
- illegal immigrants

- former victims of modern slavery and human trafficking

Spotting the signs

General indicators

Trafficking victims are often lured into another country by false promises and so may not easily trust others.

They may:

- be fearful of police / authorities.
- be fearful of the trafficker, believing their lives or family members lives are at risk if they escape.
- exhibit signs of physical and psychological trauma e.g., anxiety, lack of memory of recent events bruising, untreated conditions.
- be fearful of telling others about their situation.
- be unaware they have been trafficked and believe they are simply in a bad job.
- have limited freedom of movement.
- be unpaid or paid very little.
- have limited access to medical care.
- seem to be in debt to someone.
- have no passport or mention that someone else is holding their passport.
- be regularly moved to avoid detection.

Sexual exploitation

Victims being forced into non-consensual or abusive sexual acts.

There are many signs to look out for including the following:

- physical injuries
- evidence of physical abuse
- visible emotional distress
- someone who is uncommunicative, tense and fails to make eye contact.
- signs of sexual abuse, and / or sexually transmitted diseases

Labour exploitation

Victims being compelled to work long hours, often in hard conditions and to hand most of their wages to traffickers.

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There are many signs to look out for including the following:

- evidence of sexual abuse and threats of violence
- excessive dependence on employers or third parties
- excessive working hours
- sub-standard living conditions
- wages being withheld or excessive wage reductions.
- no access to documents - passport, ID, wage slips, bank cards
- restriction of movement and confinement, to the workplace or to a limited area

Domestic servitude

Victims being forced to work in private households, performing tasks such as childcare and housekeeping, over long hours for little pay.

There are many signs to look out for including the following:

- poor living conditions - someone living in dirty cramped or overcrowded accommodation, and / or living and working at the same address.
- few or no personal effects - victims may have no identification documents, have few personal possessions, and always wear the same clothes. What clothes they do wear may not be suitable for their work
- reluctance to seek help - victims may avoid eye contact, appear frightened or hesitant to talk to strangers and fear police.

Criminal activities

Victims are being forced to take part in criminal activities such as cannabis farming.

There are many signs to look out for including:

- properties where the curtains or blinds are closed at a property all the time.
- pungent smell coming from the property.
- unusual noises coming from the property.
- visitors at unusual times day or night

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.

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 enough trained and competent staff with designated responsibility for safeguarding (the safeguarding team)

An annual action plan, to include a training program, 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 several 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.

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- 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 programs and an on-going program 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.
- GHIL 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 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 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.

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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.

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.

Roles and Responsibilities

Group Horizon Ltd designated persons

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

The Designated Safeguarding Lead(s) will:

- Ensure that there are mechanisms in place to assist the staff to understand and discharge their roles and responsibilities as set out in "Keeping Children Safe in Education" (2016).
- Ensure all staff have received Prevent training.
- Ensure that proper procedures and policies are in place and are followed about safeguarding and protection issues.
- Ensure all staff and volunteers receive appropriate training as part of their induction and annually thereafter.
- Ensure that they receive necessary training related to the role and have updated training.

every 3 years and in addition, keep up to date with safeguarding developments at least annually.

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- Ensure that records of training are accurately maintained for all staff in liaison with the trust administration department.
- Ensure that the profile of safeguarding remains high within GHL by communicating regular updates. Ensure all staff and volunteers have access to protocol and policy related to safeguarding.
- Ensure that parents/carers are aware that GHL may need to make referrals as this will avoid later conflict if the Trust does have to take appropriate action to safeguard a vulnerable adult.
- Be responsible for record keeping, ensuring accuracy and security.
- Act as a source of advice, support and expertise within the Trust and will be available for other staff, volunteers, and Trustees to draw upon.
- Coordinate all action regarding safeguarding concerns.
- 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)

Group Horizon Ltd have two designated Safeguarding officers:

Karen Nichols – 0191 4977722

Simon Boagey – 0191 4977722

All Staff

GHL has a duty to ensure that professional behaviour applies to relationships between staff and young people and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries.

Staff should be explicitly aware of the dangers inherent in:

- Working alone with vulnerable adults
- Physical interventions
- Cultural and gender stereotyping
- Dealing with sensitive information
- Giving to and receiving gifts from participants and parents
- Contacting adults through private telephones (Including text), email or social networking sites.
- Disclosing personal details inappropriately
- Vulnerable adults outside of office hours.

If a member of staff has reasonable suspicion that an adult is suffering harm and fails to act in accordance with this policy this will be viewed as misconduct and appropriate action will be taken by the Line Manager with the support of the DSO.

Any member of staff or visitor to GHl who receives a disclosure of abuse or suspects that abuse may have occurred must report it immediately to the DSO. Confidentiality must be maintained and information relating to the individual shared with staff on a strictly need to know basis.

All members of staff have a duty to attend training on safeguarding vulnerable adults that will enable them to fulfil their responsibilities effectively.

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 always kept secure.

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 program 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.

Safer Recruitment of volunteers associates and staff.

We are committed to ensuring that appropriate recruitment checks have been carried out as anyone may have the potential to abuse vulnerable adults, therefore all reasonable steps are taken to ensure unsuitable people are prevented from working with vulnerable adults.

Robust recruitment and selection procedures help to screen out those who are not suitable to work at GHL. We ensure that we follow the steps set out here.

Planning and advertising

- Defined role profiles which highlight the key responsibilities of the role for every job.
- Decide upon the skills and experience the role will need.
- A person specification
- Be clear about what GHL aims, and philosophy are in our adverts/ information.
- Reflect the company's positive stance on safeguarding and equal opportunities.
- Use application forms to collect information on each applicant.
- Ensure that more than one person looks at each application form.
- Ask for original identification documents to confirm the identity of the applicant, e.g., passport or driving licence.

Interviewing

- Meet with all applicants prior to any recruitment decision.
- Ensure more than one person is present.

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- The meeting or interview will enable the company to explore further the information provided in the application form. Prepare in advance questions relating to safeguarding e.g., they will provide the applicant with the opportunity to share previous experiences and give examples of how they have or would handle situations and explore their attitudes and commitment to welfare.

References

Managers will request at least two references from individuals who are not related to the applicant. One reference should be associated with the applicant's place of work and, if possible, one that demonstrates they have been involved in training/education.

References should be followed up prior to any offer of appointment being made. If the references raise any concerns, you are advised to contact the Designated Safeguarding Officer.

Disclosure and Barring Service Checks

The disclosure and barring service checks (DBS) are a tool in GHIL's recruitment process. A DBS contains impartial and confidential criminal history information held by the Police and government departments which can be used by GHIL.

to make safer recruitment decisions. It can indicate that a person is not suitable to work with vulnerable adults, for example if they have a history of sexual offending or offences against vulnerable adults. It may also tell authorities that further investigations are required, for example if the person has a history of drug dealing or racist offending.

All staff or volunteers with substantial access to vulnerable adults at the company have an Enhanced Disclosure and barring Service check before starting work and prior to confirmation of employment.

GHIL will consider the Rehabilitation of Offenders Act and only consider offences which are relevant to the care, supervision, and training of the participants. This will take the form of producing a risk chart to fully understand the risk involved as well as gathering all the information regarding previous convictions and offenses. Any decision would be made by consulting the SMT and other organisations involved before deciding on the candidate.

Appointing volunteers and staff GHIL will consider all the information they receive via the application form, confirmation of identity, and the outcome of the take up of references and criminal records check. This information will then be considered alongside the outcome of the meeting/ interview to make an informed decision as to whether to accept the applicant.

Post appointment decisions

It is important that once a new Staff Member/Associate or Volunteer has been recruited, follow up action is taken, and this should include:

- Any qualifications are substantiated e.g., request to see copies of their relevant certificate(s)
- New associates are made aware and sign up to the company's safeguarding policy and procedures, best practice guidelines and codes of conduct.
- The roles and responsibilities of the new Staff Member/Associate or Volunteer are signed up to
- Training needs are established and actioned.
- A period of supervision/observation or mentoring is used to support the new staff member or associate/volunteer; this is often referred to as an induction.
- One-line Safeguarding, E&D and Prevent Training if it was taken over three years ago is renewed.

Code of Conduct

It is expected that all GHL staff will read and adhere to the company code of conduct relating to their role. The staff code of conduct sets out the expectations of the member of staff in their role and can be referred to in the event of any incident. A review of this code of conduct will be completed during the appraisal process at the end of each year.

As well as staff, any associates/volunteers and students must also read and adhere to the code of conduct to ensure

they are aware of the expectations.

Further information can be found in the Safer Recruitment Policy.

Managing Risk

We naturally assess the potential for risks when planning activities. However, to ensure the welfare of all participants within our care it is important to always ask the following basic questions:

- What is the activity?
- Where is the activity going to take place?
- Are there any additional needs within the group?
- How do they affect the participant's ability and needs in terms of safe-guarding?
- Are there mixed groupings?
- What experience and qualifications do the trainers have?
- Are staffing levels appropriate to the needs of the group?
- Do you have someone with the appropriate level of first aid training for the needs of the group?

Lone working with individual participants should be avoided if possible. However, it is recognised that there will be occasions when there is no alternative.

The following guidelines should be considered by staff:

- Let another member of staff know that they are alone with a participant.
- Keep the door open to the room that they are in or ensure they are in a room with an uncovered glass panel in the door
- If this is a regular occurrence (such as regular individual lessons/work experience/transportation), the parent/carer should be informed of the situation.
- Should anything happen during the session that makes the staff member uncomfortable, this should be reported to the Designated Safeguarding Officer immediately

Reporting

The term disclosure in this context is used to describe the sharing of concern(s) by one individual to another and not the Disclosure Barring Service formal record of an individual's relevant convictions. There is a legal and moral responsibility to report any concerns about a vulnerable adult in any context. GHL will support anyone who, in good faith, reports his or her concern that a colleague is, or may be, abusing a vulnerable adult, even if that concern is proved to be

unfounded.

Concerns may arise because:

- A vulnerable adult informs you directly that he or she is concerned about someone's behaviour towards them.
- You become aware, through your own observations or through a third party of possible abuse occurring.
- Most suspicions of abuse come about from observation of changes in the vulnerable adult's behaviour, appearance,
- attitude or relationship with others.
- Your suspicions may develop over time.

The matter should be reported directly to the DSO who will then inform the local Police.

What to do if a vulnerable adult discloses to you

If a vulnerable adult informs you directly that they are concerned about someone's behaviour towards them, this is known as a disclosure. A disclosure may be given slowly over time or all at once and it may seem incomplete, unclear and may sometimes be retracted. Vulnerable people do not often tell in one simple 'disclosure'.

The person receiving the disclosure should:

- React calmly so as not to frighten the vulnerable adult.
- Ensure the immediate safety of the vulnerable adult.
- Tell the vulnerable adult that he or she is not to blame and that he or she was right to tell.
- Take what the vulnerable adult says seriously.
- If the vulnerable adult needs immediate medical treatment, take them to hospital or telephone for an ambulance, inform doctors of concerns and ensure that they are aware that this is safeguarding concern as it is their responsibility to refer this on appropriately to the Police.
- When speaking with the vulnerable adult keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said.
- Re-assure the vulnerable adult but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments.
- In the event of suspicion of sexual abuse try to avoid the individual bathing or showering until given permission to do so. Washing can destroy valuable evidence.
- Take a detailed written record of what the person said to you.
- As soon as the vulnerable adult completes the disclosure make sure you accurately record what they said using their language and of any actions you may have taken as a result.

Safeguarding Reporting Form

This form should be used to record safeguarding concerns relating to Children and/or Vulnerable persons. In an emergency please do not delay in informing the police or social services. All the information must be treated as confidential and reported to the Designated Safeguarding Officer within one working day or the next working day if it is a weekend.

The form should be completed at the time or immediately following disclosure, but after all necessary emergency actions have been taken. Please complete the form as fully as possible.

1 Your Details – the person completing the form			
Name:	Click or tap here to enter text.		
Position:	Click or tap here to enter text.		
Telephone:	Click or tap here to enter text.	Email:	Click or tap here to enter text.

2 Details of the person affected			
Name:	Click or tap here to enter text.		
Address:	Click or tap here to enter text.		
Telephone:	Click or tap here to enter text.	Email:	Click or tap here to enter text.

3 Details of the incident (please describe in detail using only the facts)			
Click or tap here to enter text.			

4 Other present or potential witnesses			
Name:	Click or tap here to enter text.		
Address:	Click or tap here to enter text.		
Telephone:	Click or tap here to enter text.	Email:	Click or tap here to enter text.

5 Additional relevant information (please detail anything else that you believe to be helpful or important)			
Click or tap here to enter text.			

I have completed this form and provided information that is factual and does not contain my own views or opinions on the matter.

Print Name: Click or tap here to enter text.

Date: Click or tap to enter a date.

Signature: Click or tap here to enter text.

Printed Copy Is Uncontrolled

File Name: KMP-002 GHIL Safeguarding Policy

Version 13 Feb 2023

Path to Digital Copy: <https://grouphorizon.sharepoint.com/policies/>