

2025

# KMP 002 GHL Safeguarding Policy



**GroupHorizon**  
LIGHTING UP YOUR FUTURE

## Policies and Procedures

## **GHL SAFEGUARDING POLICY**

### **1. Policy Statement**

Group Horizon Ltd (GHL) is committed to safeguarding all learners, including children and adults with care and support needs, by promoting their welfare, wellbeing, and right to safety. This policy aligns with statutory requirements including the Care Act 2014, Keeping Children Safe in Education 2024, Working Together to Safeguard Children (2023), and the Prevent Duty (2015). We operate in the context of a training environment and apprenticeship delivery, ensuring safeguarding is embedded across teaching, assessment, and learner support.

### **2. Scope**

This policy applies to all GHL employees, volunteers, associates, agency staff, and contractors. It extends to learners aged 16+, including apprentices and adults with care and support needs. It includes safeguarding across face-to-face, remote, and online learning environments, as well as external placements.

### **3. Terminology and Legal Framework**

'Adults with care and support needs' replaces the outdated term 'vulnerable adults', in line with the Care Act 2014. These are individuals who may be unable to protect themselves from harm due to age, illness, disability, or other social factors.

Relevant legislation includes:

- Care Act 2014
- Children Act 1989 and 2004
- Data Protection Act 2018 / UK GDPR
- Equality Act 2010
- Mental Capacity Act 2005 and Amendment Act 2019
- Prevent Duty 2015
- Modern Slavery Act 2015
- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (2024)

### **4. Types of Abuse**

Abuse includes:

- physical,
- sexual,
- emotional/psychological,
- financial,

- discriminatory,
- domestic abuse,
- neglect/acts of omission,
- self-neglect,
- modern slavery,
- organisational abuse, and
- online/digital exploitation.

GHL also recognises the risk of Radicalisation and grooming, in line with Prevent guidance, and the influence of AI-enabled threats such as cyber abuse, impersonation, and online harassment.

## 5. Key Principles and Approach

- Safeguarding is everyone's responsibility
- Making Safeguarding Personal (MSP) underpins all adult safeguarding activity
- Empowerment, choice, and control must be supported
- All learners must be treated with dignity and respect
- Multi-agency collaboration is vital
- Concerns must be acted on promptly, proportionately, and confidentially

## 6. Roles and Responsibilities

Group Horizon Ltd has a Designated Safeguarding Lead (DSL) and a team of Safeguarding Officers (SOs). The DSL is Karen Nichols, who is responsible for oversight of all safeguarding practice and for securely storing all confidential safeguarding records.

Our Safeguarding Officers are Simon Boagey, Alison Thomson, and Rachel Alder. While all formal records are maintained by the DSL, any safeguarding concerns or disclosures can be reported directly to any of the SOs.

In addition to reportable concerns, Group Horizon Ltd also maintains a log of safeguarding-related 'near misses'. These are situations that do not meet the threshold for formal referral to external safeguarding agencies, but which are nonetheless recorded, monitored, and reviewed internally to ensure learner safety and continuous improvement in our safeguarding approach.

- All staff must complete safeguarding and Prevent training at induction and refresh at least every 3 years
- Reflective supervision is encouraged for all DSLs, assessors, and staff with pastoral responsibilities
- GHL's Board and SMT oversee annual review and policy governance

## 7. Safer Recruitment and Staff Conduct

- All staff in regulated activity are subject to Enhanced DBS checks
- Induction includes safeguarding responsibilities and safe working practices
- Staff must avoid lone working unless risk assessed and approved
- Boundaries must be upheld in digital communication and face-to-face delivery
- Concerns about conduct must be escalated via GHL's whistleblowing or safeguarding procedures

## 8. Training and Supervision

All GHL staff must:

- Complete safeguarding and Prevent training on induction
- Refresh safeguarding every 3 years (minimum)
- DSLs undertake external training and annual CPD aligned to RCN Adult Safeguarding Competencies (2024)
- Managers ensure training records are kept up to date and accessible for audit

## 9. Reporting and Escalation

All safeguarding concerns must be reported to a DSL within 2 hours. In cases of emergency, 999 should be called.

Reports must include:

- Date/time/place
- Names of those involved
- Concern description and observations
- Action taken

Concerns may be shared without consent if the individual is at risk or lacks capacity. GHL follows the Information Sharing Guidance (DfE, 2023).

## 10. Making Safeguarding Personal (MSP)

GHL adopts the MSP framework by placing individuals at the centre of safeguarding decisions.

We aim to:

- Support individuals in identifying outcomes that matter to them
- Promote choice and control
- Tailor responses to the specific needs and contexts of each case

## **11. Confidentiality and Data Protection**

All safeguarding records are confidential and securely stored by the DSL.

Information is only shared on a need-to-know basis in line with UK GDPR and the Care Act.

Staff must not share safeguarding information outside approved processes.

## **12. Monitoring and Review**

This policy is reviewed annually and following any major legislative updates or safeguarding incidents.

The DSL provides safeguarding updates to the Senior Management Team. Reports cover:

- Training compliance
- Case volumes and themes
- Learner and staff feedback
- Actions and learning