



HORIZON COMMUNITY TRAINING SAFEGUARDING POLICY & PROCEDURE

Policy Number	HCT-SG-003
Version	3
Applicable To	All Members of the Horizon Community & Visitors
Document Owner	Kath Shanahan
Last Amended	September 2023
Review Period	Annually
Availability	Horizon's Policy Folder, SharePoint, Learner and Community Members Handbook and Company's Website.

Purpose

This policy and procedure set out guidelines that outline Horizon Community Training (Horizon) plan for ensuring Safeguarding. It is the connection between our vision and values and its day-to-day operations.

Our procedures explain the specific action plans for carrying out this policy. Procedures inform how to deal with a situation and when.

Using policies and procedures together provides a well-rounded view of the Horizon workplace. Everyone will know what type of culture we are striving to create, what behaviour is expected of us all and how to achieve both of these.

Introduction

Horizon is pro-active with regard to Safeguarding and our focus is on prevention. We also have in place robust systems that enable us to respond promptly to any Safeguarding issues that may arise.

Horizon's Safeguarding Policy is the manifestation of our commitment to ensuring the well-being of everyone involved with Horizon and to raising awareness of our collective responsibility for safeguarding and promoting the welfare of children, young people and vulnerable individuals within the Horizon sphere of activity.

This policy document provides clear and unambiguous guidance regarding what is required from everyone in Horizon to ensure our Safeguarding aims are achieved.

Six principles guide and inform our efforts (Care Act 2014). These are:

Empowerment – we give individuals the right information to enable them to recognise abuse and what they can do to keep themselves safe. We consult with them before taking any action. Where someone lacks the capacity to make a decision we always act in their best interests.

Prevention – we help the community to identify and report signs of abuse and suspected criminal offences. We train staff how to recognise these signs and take action promptly to prevent abuse occurring.

Proportionality – where there is a risk of abuse or neglect, and before we make a decision, we discuss with the individual and, where appropriate, partner agencies regarding what action to take.

Protection – we employ effective ways of assessing and managing risk. We have a complaint and reporting procedure for abuse and suspected criminal offences.

Partnership – we share information. We have multi-agency arrangements in place and staff understand how to use these.

Accountability – the roles of all agencies are clear, together with the lines of accountability. Staff understand what is expected of them and others.

Everyone at Horizon has a responsibility to make themselves fully aware of the content of this Policy.

Definitions

DBS – Disclosure and Barring Service

MASH – Norfolk Multi-Agency Safeguarding Hub Team

ESFA – Education & Skills Funding Agency

EHCP – Education, Health and Care Plan

CPD – Continuous Professional Development

HR – Human Resources

Horizon Community Members – anyone who is a part of the Horizon's Community (staff, learners, volunteers, interns, secondees, partners and sub letters)

Vulnerable Learners include (but are not limited to)

- Looked After Children
- Care Leavers under 25
- Unaccompanied Asylum Seekers
- Those subject to a Special Guardianship Order
- Those subject to a Child Arrangement Order
- Young Carers under 25
- Carers of those with an additional need aged 25 or over

- Those who disclose they are adopted
- Students accessing Free College Meals
- Those with Educational Health Care Plans, disabilities or are accessing High Needs funding.

Roles and Responsibilities in Horizon regarding Safeguarding

Chief Executive

The Chief Executive is Mark Shanahan

Contact details:

Email: mark@Horizoncommunitytraining.co.uk

Tel: 01493 717767

The Chief Executive is responsible for:

- Appointing the Designated Safeguarding Lead
- Creating a culture in which all staff and volunteers feel able and are encouraged to raise concerns about poor or unsafe practices and are confident that such concerns are addressed sensitively in accordance with the agreed Public Interest Disclosure ('Whistle-blowing') procedures

Designated Safeguarding Lead

The Designated Safeguarding Lead is Mia Louise Edgar

Contact details:

Email: Mia@Horizoncommunitytraining.co.uk

Tel: 01493 717767

The Designated Safeguarding Lead reports directly to the Chief Executive.

The Designated Safeguarding Lead is responsible for:

- Ensuring that the Safeguarding and Well-being policies and procedures are followed by all staff, volunteers, visitors and contractors
- Representing Horizon Community Training with all external agencies in relation to Safeguarding and Well-being
- Ensuring that an annual review of the Safeguarding policy and the code of conduct for staff and volunteers is conducted.
- Delivering internal Safeguarding training courses and arranging external courses for all members of Horizon
- Ensuring all staff are up to date in their training concerning Safeguarding and the maintenance of staff records
- Advising on and contributing to the recruitment of staff and volunteers
- The induction new staff/volunteers regarding their responsibilities regarding Safeguarding
- Checking that Visitors' records are maintained and the procedures regarding visitors and 'Regular' visitors are being followed correctly
- Advising and, if necessary, assisting tutors in the development and implementation of the behaviour codes for learners

- Recording all Safeguarding Incidents and reports on the Safeguarding Incidents Tracker and completing Cover Form HSG/01 for each incident
 - Maintaining and ensuring the security of information held in the Safeguarding reporting systems, both paper-based and electronically stored
 - Ensuring that investigations into any allegations made against staff and volunteers of Horizon are conducted
 - Liaising with the Local Authority Designated Officer at the Norfolk and Suffolk Safeguarding Children and Adults Partners in the event of an allegation of abuse being made against a member of staff
 - Monitoring activity in the learner breakout room and on-line activity in the computer room during private study sessions
 - Where practicable, conducting follow-up of withdrawn students on a termly basis
 - Obtaining permission or consent for media recording such as photographs, videos and sharing images for use by marketing, and maintaining records centrally and on students' personal files
 - Maintaining records of vulnerable learners
- Producing a termly report on Safeguarding at Horizon to include:
- All relevant Safeguarding activities, inductions, training/meetings attended, reports written or any other Safeguarding trends or concerns
 - Good practice and recommendations that could affect policy
 - The status of all staff training
- Ensuring that this policy is available to anyone on request, is easily available via the Horizon website and has been written in line with national guidance and the requirements of the Norfolk and Suffolk Safeguarding Children and Adults Partners' policies and procedures
 - Ensuring that Horizon contributes to inter-agency working in line with 'Working Together to Safeguard Children' (HM Government, July 2018) and, where necessary informs the Chief Executive of any deficiencies

Horizon Community Members

The responsibilities of all community members of Horizon are described throughout this policy document. Compliance is a requisite for engagement or employment with Horizon.

Staff Requirements & Responsibilities

Disclosure and Barring Service (DBS)

All staff are subject to a Disclosure and Barring Service (DBS) check, details of which are kept on staff personal files and Horizon's central tracker.

Safeguarding Training

All staff must complete Norfolk Safeguarding Children Partnership (NSCP) training <https://www.norfolkscb.org/people-working-with-children/nscb-training> All staff will attend regular Horizon Internal Safeguarding training.

Records of all training undertaken are kept on staff personal information folder and in Horizon's central staff tracker.

Qualifications

All staff are required to present original documentary evidence of their relevant qualifications, copies of which will be kept on their personal files.

Relevant Policies & Documents

In addition to this specific policy on Safeguarding, the following policies and procedures are relevant and all staff must comply with them.

- Health, Safety and Well-Being
- Behaviour Code
- Bullying and Harassment
- Disciplinary and Grievance
- First Aid and Emergency

All these documents are on the Horizon intranet and linked, via QR codes, in your Horizon manual. They are also available at reception on request

The following UK Government documents are compulsory reading for all staff/Volunteers at Horizon.

- UK Government Working Together to Safeguard Children – A guide to inter-agency working to safeguard and promote the welfare of children [Working Together to Safeguard Children 2018 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/68121/working-together-to-safeguard-children-2018.pdf)
- UK Government Keeping Children Safe in Education: for school and college staff Part 1 [Keeping children safe in education 2023 - part one \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/68121/keeping-children-safe-in-education-2023-part-one.pdf)

First Aid Training

Key members of staff will undergo regular First Aid Training, records of which are kept in personal files and the central register.

Implementation of Safeguarding Policy & Procedure

Induction Process – Students

All learners will be asked and assisted to complete a Wellbeing Questionnaire. This scaler-based questionnaire enables Horizon to track the well-being of learners over time and assists the identification of risk. This questionnaire will be administered at regularly and at key times during the learner's progress at Horizon eg at the completion or commencement of a course or following a significant life event for the learner.

Safeguarding is part of the Induction to the Horizon module and is included in the course handbook. As part of the induction module, learners will be introduced to the Safeguarding Lead who will explain their role and responsibilities.

Staff/volunteers

When new staff and volunteers join Horizon they will be informed of the Safeguarding Lead and how to contact that person.

They will be informed of the Safeguarding arrangements that are in place and be required to attend Safeguarding training with the Safeguarding Lead or other suitably qualified member of Horizon, prior to commencement of engagement.

They will be told how to refer disclosures or other concerns and their understanding of the process will be checked.

They will be given a copy of Part One of 'Keeping Children Safe in Education' (Pt.1-KCSIE), (DofE, September 2023) along with the Behaviour Code. Staff must confirm they have read and understood Pt.1-KCSIE by signing an acknowledgement of this which will be held on their personal file. Staff understanding of, and any updates to, Horizon's Safeguarding Policy & Procedure will be checked through annually.

Training will include Safeguarding information relating to signs and symptoms of abuse, how to identify, report and manage a disclosure from a young person or vulnerable adult and how to record any issues of confidentiality. Continued training will also remind staff and volunteers of their responsibilities in relation to Safeguarding. Further staff updates will be given via team meetings and informal case reviews with the referral agency/school and members of the Health, Safety and Wellbeing team, following referrals.

Staff will be made fully aware that any breach of Safeguarding Policy & Procedure is a disciplinary offence.

Visitors or contractors

All visitors, when signing in, will be informed of their responsibilities in respect of Safeguarding and provided with Horizon's Safeguarding Information Card.

All visitors are required to agree to:

- Comply with Horizon's Safeguarding Policy & Procedure
- Complete and sign the Horizon's visitor form. These forms will be stored in the Visitor Records file
- Report any Safeguarding incident immediately to any available member of staff

Visitors are given a Safeguarding Information Card – a quick reference aide memoire including all the necessary contact details required in the event of a Safeguarding incident. This aide memoire is held with the visitors ID card.

With regard to 'regular' visitors to Horizon, in addition to the above they will be given a set of our Safeguarding procedures and contact details for the Safeguarding Lead (a regular visitor to be determined by the Chief Executive).

Safeguarding Reporting Procedure

Primary Objective

Once a concern has been identified or reported, the primary objective is the removal of that harm and the protection of the complainant/victim. The focus of action is the cause of the harm. Horizon will resist any attempt to place the focus on the victim.

Initial action on receipt of a report of a concern or a complaint – Staff/Volunteers

A Safeguarding matter that must be reported can range from a report of a concern to a direct complaint. Early identification of the cause of a concern can be an effective preventative measure that reduces the risk of escalation or continuance.

What might appear to be a report of a minor concern may be the first step towards disclosure of a far more serious matter. For this reason, every report must be properly reported and investigated. The documentation of the initial reporting may be crucially important at a later stage.

On receipt of a report of a concern or a complaint, the staff member must:

- Take whatever steps are necessary to remove any immediate threat or risk and reassure the person reporting /complainant/victim
- If appropriate, conduct an initial investigation to determine the appropriate course of action, taking into consideration the wishes of those who are or may be affected
- Complete the Safeguarding Incident Report form (HSG-02)
- Report the matter to the Safeguarding Lead as soon as practicable, unless the matter in question involves that person, in which case the Chief Executive must be informed. The Safeguarding Lead will complete a cover form (HSG-01) and register the docket in the Safeguarding Incident Tracker
- If it appears that a criminal offence may have occurred, contact the police immediately and inform the Norfolk Multi-Agency Safeguarding Hub Team (MASH).
- Depending on the nature of the incident, inform Norfolk Child Services through the relevant Education, Health and Care Plan (EHCP) co-ordinator

Areas of Safeguarding concern would include

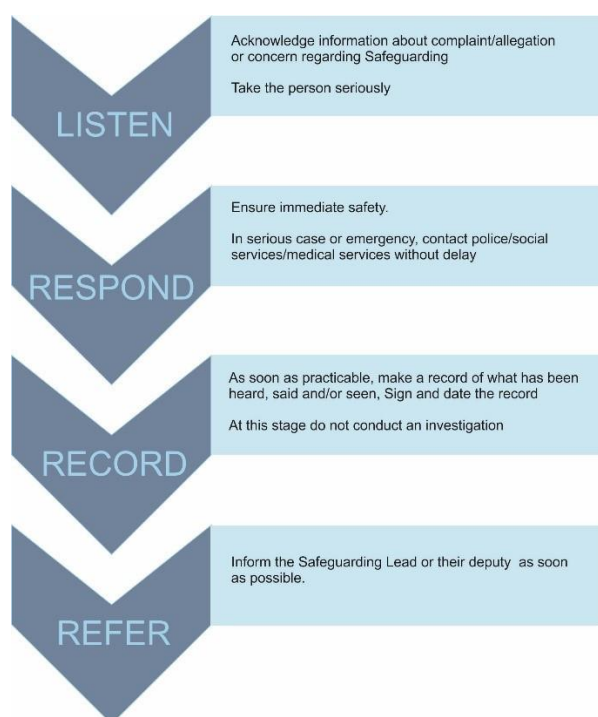
- Sexual exploitation
- Physical abuse
- Psychological abuse
- Financial exploitation
- Discrimination
- Bullying
- Inappropriate touching
- Inappropriate comments
- Stalking/harassment
- Abusive relationships
- On-line activity (cyber bullying, grooming)
- Mental health issues
- Neglect
- Self-neglect
- Self-harming
- Security of hazardous or dangerous materials and equipment in workplace
- Exposure to risk in workplace

The list is not exhaustive and, as such, any incident that causes concern to any individual must be treated as a Safeguarding issue.

Staff are made aware that they have a duty to report any concern that they may have, however it is revealed. Non-reporting is not an option.

- Direct disclosure: this is a specific statement that something is wrong
- Indirect disclosure: ambiguous statements, which imply that something is wrong
- Behavioural disclosure: any behaviour that indicates that something is wrong
- Non-verbal disclosure: writing letters, drawing pictures or trying to communicate in any way to someone that something is wrong

Quick Reference Guide Flowchart



Sources of Additional Advice

The following agencies are available to provide advice and support when considering the appropriate course of action.

- NSPCC (National Society for the Prevention of Cruelty to Children) <https://www.nspcc.org.uk/>
- The Samaritans – <https://www.samaritans.org/>
- Childline – <https://www.childline.org.uk/>
- MIND – help for mental health problems <https://www.mind.org.uk/>
- The Matthews Project <https://www.matthewproject.org/>

Managing allegations against staff and volunteers

In the event of an allegation being made about a staff member or volunteer at Horizon, the complaint is to be made directly to the Chief Executive.

If a complainant does not feel confident to raise their concerns with anyone at Horizon, details of how to contact the Local Authority Designated Officer directly on 0300 123 2044 (Suffolk) or 01603 223473 (Norfolk) are in the Learner's manual.

Additional advice can be gained from the NSPCC Whistleblowing Adviceline on 0800 028 0285 or help@nspcc.org.uk.

Horizon will follow the procedures outlined by the Norfolk and Suffolk Safeguarding partners and 'Keeping Children Safe in Education' (DofE, September 2023) and, where necessary, seek advice from the Local Authority Designated Officer.

No investigation or action will be undertaken before receiving advice from the Local Authority Designated Officer, unless it is considered necessary to immediately remove the threat or risk to the complainant.

Horizon will fulfil its legal duty to refer to the Disclosure and Barring Service if there is any reason to believe the member of staff has committed one of a number of DBS listed offences.

If these circumstances arise in relation to a member of staff at Horizon, a referral will be made as soon as possible after the resignation or removal of the staff member, in accordance with advice from the Local Authority Designated Officer

Maintaining records

Every action will be recorded on form HCT Safeguarding-03 in the Safeguarding Incident Report to include every interview, discussion, contact with any other agencies and decisions made concerning the matter. Specific details and records of any telephone calls will be made on HCT Safeguarding-04 and attached to the incident report.

Specific details and records of any meetings will be made on HCT Safeguarding-05 and attached to the incident report.

All information held by Horizon complies with Horizon's Privacy Policy.

Recording, storage and sharing of information

Any recorded paper-based information will be kept in a separate named file and in a secure cabinet, in accordance with legislation, and not with the student's academic file. These files will be the responsibility of the Safeguarding Lead who is the designated Safeguarding officer. Safeguarding information will only be shared with those involved in the student's well-being and is strictly confidential.

Electronically-stored information will remain within Horizon's Safeguarding system and is only accessible by designated staff with responsibility for maintaining this system and by members of the Safeguarding and Wellbeing team.

Sharing of information external to Horizon will operate within the framework outlined by 'Information Sharing' (HM Government, July 2018) and 'Working Together to Safeguard Children' (HM Government, July 2018).

Overriding Principle

The course of action must take into account the wishes of the complainant/victim. However, there may be occasions where Horizon is obligated by law or by the serious nature of the incident(s) to take a certain course of action. This must be clearly explained to the complainant/victim on receipt of a complaint or report.

This may involve working with the Norfolk Multi-Agency Safeguarding Hub (MASH), and in partnership with other agencies such as the police, social services, NHS and schools in raising and reporting the Safeguarding concern.

Resolution Interview

Once the issue has been dealt with an interview with the complainant/victim will be conducted.

The aim of the interview is to discover:

- The level of satisfaction regarding the outcome that the complainant/victim feels
- How confident they feel about going forward
- Whether Horizon needs to take any additional steps concerning this issue or in general
- If the complainant/victim is confident and has all the information they require to inform Horizon in the event of any future difficulties

A record of the key points of the interview will be made on the Safeguarding Incident Report and signed by interviewer and the complainant/victim.

Transfer of Safeguarding file when a student leaves Horizon

When a young person or vulnerable adult leaves Horizon, the Safeguarding Lead will contact the Safeguarding team at the new college or training provider and will forward the Safeguarding file/information to them in a confidential and agreed format.

It is Horizon's preferred method of transfer for files to be transferred either by hand or recorded delivery. If this is not possible then any files transferred via email must be encrypted with a password and the password sent by separate email.

The transfer of a Learner's files will be recorded on the Safeguarding system and a copy of the transfer paperwork also uploaded to the Safeguarding system.

Horizon will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving party or evidence of recorded delivery.

Files received from feeder schools and other establishments must only be recorded on Safeguarding systems by the Safeguarding Lead. The information must be recorded in the Safeguarding system and a printed copy stored in the secure filing cabinet.

If a file is needed for external meetings which take place outside of the office where the file is stored, it will be signed out and back in again by the staff member using it and counter signed by the Safeguarding Lead.

Consent for sharing this information will be gained at every stage of the process or wherever possible if a person is not coming to immediate harm.

Contact details

Designated Safeguarding Lead - Horizon

Name: Ms. Mia Edgar

Phone/email:

This policy statement came into force on

..... (date)

We are committed to reviewing our policy and good practice annually

This policy statement and accompanying procedures were last reviewed on

..... (date)

Signed: date:

Safeguarding Lead Horizon Community Training CIC

Signed: date:

Chief Executive Horizon Community Training CIC

