

INDEPENDENT HORIZONS

SAFEGUARDING YOUNG PEOPLE POLICY AND PROCEDURE

Supported accommodation for looked after children and care leavers aged 16 and 17



Date reviewed	26 June 2026
Next review due	26 June 2027, or earlier if legislation, guidance, safeguarding learning or service arrangements change
Approved by	Karen Burton, Registered Manager / Nominated Individual
Version	2026 v1

PURPOSE

The purpose of this policy is to set out how Independent Horizons safeguards and promotes the welfare of young people living in its supported accommodation. It explains how team members must prevent harm where possible, recognise indicators of abuse, neglect, exploitation or other safeguarding risk, respond to disclosures and concerns, record accurately, share information lawfully, and escalate without delay.

This policy applies to all team members, agency workers, volunteers, students, contractors, consultants and any person working on behalf of Independent Horizons. It applies to all young people supported by the service, including looked after children and care leavers aged 16 and 17.

Safeguarding position: A young person aged 16 or 17 is still a child in law. Living more independently, attending college or having increasing autonomy does not reduce their entitlement to protection, support, advocacy, suitable accommodation and effective multi-agency safeguarding.

AIM

Independent Horizons aims to provide safe, stable and supportive accommodation where young people are protected from harm and helped to build the knowledge, confidence and skills they need for adulthood.

1. embed a culture where safeguarding is everyone's responsibility and young people are listened to, believed and supported;
2. ensure team members understand the signs of abuse, neglect, exploitation, extra-familial harm, online harm and radicalisation;
3. ensure every concern, suspicion, allegation or disclosure is reported, recorded and acted on promptly;
4. support young people to understand risk, healthy relationships, consent, online safety, community safety and how to seek help;
5. work in partnership with social workers, placing authorities, safeguarding partners, police, health, education and other relevant professionals;
6. use trauma-informed, relationship-based practice that is calm, respectful, proportionate and never permissive of harm;
7. maintain accurate safeguarding records that demonstrate action, analysis, follow-up and learning.

LEGISLATIVE AND REGULATORY FRAMEWORK

This policy has been drafted to align with the current safeguarding and supported accommodation framework in England. It should be read alongside local safeguarding partnership procedures and the young person's care plan, pathway plan, placement plan, risk assessment and support plan.

Framework	Safeguarding relevance
Supported Accommodation (England) Regulations 2023	Regulations 5, 6, 7, 20, 21, 22, 24-27, 31 and 32 are especially relevant to safeguarding, protection, support, records, behaviour, missing episodes, serious event notification, complaints and quality review.
Guide to the supported accommodation regulations including quality standards	Explains expectations for providers supporting looked after children and care leavers aged 16 and 17, including child protection policies, staff competence, partnership working and young people being enabled to keep themselves safe.
Working Together to Safeguard Children 2026	Sets out multi-agency safeguarding expectations, the definition of a child, safeguarding and child protection, information sharing, extra-familial harm and working with statutory safeguarding partners.
Children Act 1989 and Children Act 2004	Provides the statutory framework for children in need, looked after children, local authority duties, safeguarding and promoting welfare, and partnership responsibilities.
Care Planning, Placement and Case Review (England) Regulations 2010 and leaving care framework	Supports placement planning, care/pathway planning, review arrangements, transition to adulthood and responsibilities for eligible/relevant/former relevant children.
Equality Act 2010, Human Rights Act 1998 and UK GDPR/Data Protection Act 2018	Requires non-discriminatory, rights-respecting, lawful, fair and proportionate practice, including safe and necessary information sharing.
Sexual Offences Act 2003, Modern Slavery Act 2015 and Counter-Terrorism and Security Act 2015	Relevant to sexual abuse, exploitation, trafficking, slavery, coercion, radicalisation and Prevent concerns.
Safeguarding Vulnerable Groups Act 2006 and safer recruitment guidance	Relevant to DBS checks, barred list checks, suitability decisions and preventing unsuitable adults from working with young people.
Ofsted SCCIF: supported accommodation	Inspection focuses on the impact of support on young people's experiences, progress, safety, welfare and preparation for independence.

LINKED INDEPENDENT HORIZONS DOCUMENTS

This policy must be read alongside the following documents, where they apply:

8. Statement of Purpose and Young Person's Guide;
9. Missing Young Person Policy;
10. Behaviour Management and Positive Relationships Policy;
11. Child Sexual Exploitation and Child Criminal Exploitation Policies;
12. Online Safety / E-Safety Policy;
13. Allegations Against a Team Member Policy;
14. Complaints Policy;
15. Whistleblowing Policy;
16. Safer Recruitment Policy;
17. Professional Boundaries Policy;
18. Confidentiality, Data Protection and Information Sharing Policy;
19. Notification of Serious Events Policy;
20. Prevent, FGM, Forced Marriage, Domestic Abuse, Substance Misuse, Anti-Bullying and Location Risk Assessment documents.

POLICY STATEMENT

Independent Horizons will act promptly and proportionately to safeguard any young person who may be experiencing, or be at risk of, abuse, neglect, exploitation or other harm. The service will not wait for proof

before reporting a concern. Reasonable concern, disclosure, allegation, professional curiosity or a pattern of worrying information is enough to trigger safeguarding action.

Safeguarding practice must be child-centred, rights-respecting and trauma-informed. Team members must listen carefully, take what young people say seriously, avoid blame or judgement, and explain what will happen next. Team members must not investigate safeguarding concerns themselves. Their role is to keep the young person safe, preserve information, record accurately and escalate to the appropriate person or agency.

Supported accommodation promotes independence, but it is not a reason to leave young people to manage significant risk alone. Staff must balance independence-building with active safeguarding, clear boundaries, practical support and effective partnership working.

DEFINITIONS

Safeguarding and promoting welfare: Protecting children from maltreatment, preventing impairment of health or development, ensuring children grow up in safe and effective care, and taking action to enable the best outcomes.

Child protection: The activity undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm.

Child: Anyone who has not yet reached their 18th birthday. A 16 or 17 year old in supported accommodation remains a child.

Team member: Any person working for or on behalf of Independent Horizons, whether paid, unpaid, permanent, temporary, agency, volunteer, contractor or consultant.

Designated Safeguarding Lead / Designated Safeguarding Officer: The senior person responsible for safeguarding oversight, advice, referrals, liaison with statutory agencies and ensuring records and actions are followed up.

Extra-familial harm: Harm that occurs outside the family or home context, including peer groups, schools or colleges, neighbourhoods, online spaces, gangs, exploitation networks or intimate relationships.

Contextual safeguarding: An approach that considers the places, relationships and social contexts in which young people may experience harm, not only the behaviour of the individual young person.

Significant harm: The threshold that justifies compulsory intervention in family life in the best interests of the child. Team members do not decide this threshold alone; they report concerns so statutory agencies can assess risk.

ROLES AND RESPONSIBILITIES

Registered Manager / Designated Safeguarding Lead - Karen Burton

21. lead safeguarding practice and make sure this policy is understood, implemented and reviewed;
22. ensure concerns are referred to the relevant social worker, placing authority, emergency duty team, police, LADO or other safeguarding agency without delay;
23. ensure Ofsted and relevant persons are notified of serious events in line with Regulation 27 and the Notification of Serious Events Policy;
24. ensure safeguarding records are accurate, secure, reviewed and used to inform support planning and risk management;
25. ensure team members receive induction, safeguarding training, supervision, debriefing and learning from incidents;
26. monitor safeguarding themes through audits, supervision, team meetings, young person feedback and quality of support reviews.

Nominated Individual - Karen Burton

- 27. maintain senior oversight of safeguarding governance, regulatory compliance and the effectiveness of safeguarding systems;
- 28. ensure the Registered Manager has the resources, authority and support needed to discharge safeguarding responsibilities;
- 29. review serious safeguarding incidents, allegations, complaints and regulatory notifications to identify learning.

Operations Director - Gary Burton

- 30. support operational oversight, escalation and staffing arrangements where safeguarding risk affects service safety;
- 31. ensure any conflict of interest, senior staff allegation or management absence is covered by clear alternative arrangements;
- 32. support implementation of learning across accommodation settings.

Senior Support Worker - Michael Robinson

- 33. support team members on shift to identify, respond to and record safeguarding concerns;
- 34. ensure urgent concerns are escalated to the Registered Manager/DSL or out-of-hours arrangements immediately;
- 35. support staff debriefing, reflective practice and follow-up actions after incidents.

All team members

- 36. read, understand and follow this policy and linked procedures;
- 37. know each young person's care/pathway plan, placement plan, risk assessment, support plan and safety arrangements;
- 38. remain professionally curious and act on concerns, patterns, disclosures, injuries, changes in behaviour, missing episodes, exploitation indicators or unsafe relationships;
- 39. report concerns immediately to the senior on shift and Registered Manager/DSL, and contact emergency services where immediate safety requires it;
- 40. record facts clearly, including the young person's exact words where possible, what was seen or heard, who was informed and what action was taken;
- 41. maintain confidentiality while sharing information when necessary to safeguard a child;
- 42. challenge poor practice and use whistleblowing routes if concerns are not acted on.

SAFEGUARDING VALUES AND TRAUMA-INFORMED PRACTICE

Many young people in supported accommodation have experienced loss, trauma, rejection, disrupted relationships, exploitation, domestic abuse, community violence, discrimination or instability. Their behaviour may communicate fear, shame, unmet need, distress, survival strategies or lack of trust in adults.

Team members must respond with emotional steadiness, curiosity and clear boundaries. Trauma-informed practice does not remove safeguarding duties. It strengthens them by helping staff notice risk earlier, reduce shame, avoid unnecessary escalation and repair relationships after difficult events.

- 43. prioritise physical and emotional safety;
- 44. listen to young people and take their wishes, feelings and identity seriously;
- 45. use calm, respectful language and avoid threats, sarcasm, humiliation, blame or power struggles;
- 46. offer realistic choices wherever possible, including where and when to talk and who supports the young person;
- 47. be clear about confidentiality limits and explain when information must be shared to keep someone safe;
- 48. support regulation before expecting detailed explanations from a distressed young person;
- 49. recognise strengths and progress as well as risk;
- 50. avoid unnecessary criminalisation while involving police where immediate danger, serious harm or a crime requires it.

RECOGNISING ABUSE, NEGLECT AND HARM

Abuse can be caused by adults, other young people, peers, family members, partners, professionals, strangers or organised networks. It can occur in person, online, through technology, in the community, in education settings, in transport, in accommodation, in intimate relationships or across more than one context.

Team members must consider the whole picture: what the young person says, what is observed, what has changed, what other professionals report, what records show, who the young person is spending time with, where they are going, online activity, missing episodes, money or gifts, injuries, mood, health, identity needs and patterns over time.

Main categories and related safeguarding risks

Physical abuse: Hitting, shaking, throwing, poisoning, burning, scalding, suffocation, fabricated or induced illness, use of objects to hurt a child, or any physical harm.

Sexual abuse: Forcing or enticing a child to take part in sexual activity, contact or non-contact, including rape, assault, sexual touching, grooming, sexual images, exposure to sexual activity or online sexual abuse.

Emotional abuse: Persistent emotional maltreatment, rejection, humiliation, intimidation, isolation, coercive control, exposure to domestic abuse, or denying the young person dignity, identity or voice.

Neglect: Persistent failure to meet basic physical or emotional needs, including food, shelter, clothing, medical care, supervision, emotional warmth, safety or protection from harm.

Child sexual exploitation: A form of sexual abuse where a child is exploited for power, control, status, affection, money, accommodation, substances, gifts or perceived protection.

Child criminal exploitation: A child being used, coerced or groomed into criminal activity, including county lines, debt bondage, carrying weapons, storing items, robbery, fraud or drug supply.

Online harm: Grooming, sexual images, coercion, cyberbullying, blackmail, exploitation, radicalising content, stalking, harassment, harmful challenges or unsafe contact through technology.

Domestic abuse and harmful relationships: Abusive behaviour in family, partner or intimate relationships, including controlling or coercive behaviour, threats, violence, sexual abuse, emotional abuse and economic abuse.

Radicalisation and extremism: A young person being drawn into terrorism, extremist ideology or harmful groups, including through online content, peers, family or community influence.

Modern slavery and trafficking: Movement, harbouring or control of a young person for exploitation, including sexual exploitation, criminal exploitation, forced labour or domestic servitude.

Female genital mutilation, forced marriage and honour-based abuse: Specific forms of abuse requiring immediate safeguarding response and, where applicable, statutory reporting duties.

Discriminatory abuse, hate crime and mate crime: Harm linked to protected characteristics, identity, disability, neurodiversity, culture, race, religion, sexuality, gender identity or perceived vulnerability.

Self-harm and mental health crisis: Self-injury, suicidal thoughts, overdose, severe emotional distress, high-risk behaviour or urgent mental health concerns requiring support and possible emergency response.

Abuse by young people: Harmful sexual behaviour, violence, coercion, bullying, intimidation or exploitation by another child. Staff must protect all young people involved and avoid labelling a child as an adult perpetrator.

Possible indicators

51. unexplained injuries, repeated accidents, inconsistent explanations or fear of medical help;
52. going missing, staying out late, returning distressed, unexplained travel or being found in risky locations;

53. new possessions, money, substances, accommodation offers, lifts or gifts without clear explanation;
54. older partners, controlling peers, secrecy about relationships, fear of a person or group, or sudden loyalty to unsafe people;
55. sexualised language or behaviour, sexual health concerns, pregnancy concerns, sexually transmitted infections or image-sharing concerns;
56. withdrawal, low mood, anxiety, hypervigilance, aggression, sleep disruption, school/college disengagement or sudden behaviour change;
57. substance misuse, debt, threats, weapons, involvement with police, pressure to carry items or unexplained phones;
58. online secrecy, distress after messages, blackmail, threats to share images, contact from unknown adults or harmful online content;
59. poor hygiene, hunger, untreated health needs, unsuitable clothing, exhaustion or lack of safe adult support;
60. language or behaviour suggesting shame, fear, coercion, racism, homophobia, transphobia, disablism or identity-based abuse.

CONTEXTUAL SAFEGUARDING AND EXTRA-FAMILIAL HARM

Young people aged 16 and 17 may face significant risk outside the accommodation setting, including in peer groups, education, local neighbourhoods, online spaces, workplaces, transport routes, partner relationships and family networks. Staff must not treat repeated absence, risky relationships or exploitation indicators as lifestyle choices. They may be signs of grooming, coercion, fear, trauma, poverty, social isolation or unmet need.

61. map places, people and online spaces connected to the concern;
62. consider whether other young people in the service may also be at risk;
63. share relevant information with the social worker, placing authority and safeguarding partners;
64. update the location risk assessment and individual risk assessment where new patterns emerge;
65. agree safety actions with the young person and professionals, including safe contact, transport, routines, education support and missing prevention plans;
66. avoid blaming language such as choosing, putting themselves at risk or promiscuous. Use factual descriptions of behaviour and concern.

PROCEDURE FOR REPORTING SAFEGUARDING CONCERNS

Every safeguarding concern must be acted on. The team member who notices, receives or suspects the concern remains responsible for making sure it is passed to the right person and recorded. If immediate danger exists, emergency action must not wait for management permission.

67. Make the young person and others safe. Call 999 if there is immediate danger, serious injury, urgent medical risk, a crime in progress or immediate threat to life.
68. Listen and respond calmly. Do not investigate, interrogate, promise confidentiality, confront the alleged person or ask leading questions.
69. Tell the senior on shift and the Registered Manager/DSL immediately. If they are unavailable and delay would increase risk, contact the social worker, Emergency Duty Team, police or relevant safeguarding route directly.
70. Record the concern as soon as possible. Include date, time, place, who was present, what was seen or heard, the young person's words, injuries or evidence, immediate action, who was informed and any advice received.
71. The Registered Manager/DSL will decide and record the referral route, normally including the allocated social worker or placing authority. Where required, they will contact the local authority safeguarding service, LADO, police, health, EDT or other relevant agency.
72. Follow up verbal referrals in writing within 24 hours, unless local procedures require sooner. Keep copies of referral forms, emails, advice and decisions on the young person's file.
73. Update risk assessments, support plans, missing plans and safety plans following any concern, referral or new professional advice.

74. Continue supporting the young person. Safeguarding action does not end when a referral is made; staff must monitor wellbeing, provide reassurance, maintain routines and record further information.

Escalation: If a team member believes a concern has not been acted on appropriately, they must escalate to the Registered Manager, Nominated Individual, placing authority, LADO, safeguarding partners, Ofsted or whistleblowing routes as appropriate. No team member will be penalised for raising a genuine safeguarding concern in good faith.

RESPONDING TO A DISCLOSURE BY A YOUNG PERSON

A disclosure may be direct, partial, delayed, confused, withdrawn or communicated through behaviour. The young person may test whether adults are safe before saying more. Team members must create emotional safety while maintaining clear safeguarding boundaries.

When a young person discloses, team members must:

75. listen carefully, stay calm and thank the young person for telling you;
76. believe the concern and take it seriously, even if details are unclear or change over time;
77. use open prompts only, such as 'Tell me what happened' or 'Is there anything else you want me to know?'
78. avoid leading questions, repeated questioning, judgement, shock, blame or asking why the young person did not tell someone sooner;
79. explain that you cannot keep secrets where someone may be unsafe, and say who you need to tell and why;
80. check immediate safety, injuries, medical needs and whether the young person is afraid to return to a place or see a person;
81. offer choice about immediate support where possible, such as a trusted staff member, quiet space, drink, time to regulate or advocacy;
82. record the young person's words as accurately as possible, using quotation marks where exact words are remembered;
83. report immediately to the Registered Manager/DSL or emergency safeguarding route.

Young people with communication needs, disabilities, neurodivergence, language needs or trauma responses must be offered appropriate support. This may include an advocate, interpreter, communication aid, trusted adult, adjusted environment or additional time. Staff must not assume that a young person cannot provide credible information because of disability, distress, communication style or previous history.

THIRD-PARTY CONCERNS AND PROFESSIONAL INFORMATION

Concerns may be raised by family members, peers, neighbours, professionals, police, education providers, health services, visitors or members of the community. Team members must take third-party concerns seriously, even where the information is incomplete or the person raising the concern wishes to remain anonymous.

84. record who provided the information, unless they are anonymous, and exactly what was said;
85. ask factual clarifying questions only where needed, such as when, where, who was present and whether immediate risk exists;
86. report to the senior on shift and Registered Manager/DSL without delay;
87. do not disclose unnecessary personal information to the third party;
88. share relevant information with the allocated social worker, placing authority or safeguarding agency as directed by the Registered Manager/DSL;
89. consider whether the concern affects other young people, staff, visitors or location risk.

ALLEGATIONS OR CONCERNS ABOUT ADULTS WORKING WITH CHILDREN

Any allegation or concern that a team member, agency worker, volunteer, contractor, visitor, professional or adult connected with the service may have harmed, abused, neglected, exploited, behaved unsafely towards, groomed, formed an inappropriate relationship with, or posed a risk to a young person must be treated as a safeguarding matter.

The person receiving the concern must:

90. make the young person safe and seek emergency help if required;
91. listen, record and report immediately to the Registered Manager/DSL;
92. not inform, confront or interview the adult who is the subject of the concern;
93. not investigate or gather statements beyond preserving what has been reported;
94. not promise confidentiality;
95. complete a factual written record, signed and dated.

The Registered Manager/DSL must contact the relevant LADO for advice where the allegation or concern meets the local threshold or may indicate risk of harm. The placing authority, social worker, Ofsted, police, DBS or professional regulator must be informed where required. Employment decisions such as suspension, redeployment or supervised duties must be risk-based, recorded and handled fairly. Suspension must not be automatic, but may be necessary to protect young people, preserve evidence or support a safe investigation.

If the concern is about the Registered Manager, Nominated Individual or a director, the matter must be escalated to the alternative senior leader identified in the service's safeguarding escalation arrangements, the LADO and placing authority. If local internal routes are compromised or unsafe, staff must use external safeguarding, LADO, Ofsted or whistleblowing routes without delay.

CONFIDENTIALITY AND INFORMATION SHARING

Confidentiality is important, but it must never prevent action to safeguard a child. Team members must be open with young people about the limits of confidentiality and explain that information will be shared when necessary to protect them or another person from harm.

96. share information that is necessary, proportionate, relevant, accurate, timely and secure;
97. do not delay sharing information because consent is not available, where delay may place a child at risk;
98. seek advice from the Registered Manager/DSL where unsure, unless immediate risk requires urgent action;
99. record what information was shared, with whom, when, why, and what advice or action followed;
100. keep safeguarding records secure and separate enough to protect confidentiality while remaining accessible to authorised staff who need the information to safeguard the young person.

RECORDING, MONITORING AND CASE RECORDS

Safeguarding records must be factual, respectful, timely and useful. Records may be used by social workers, safeguarding partners, police, courts, Ofsted or the young person in future. Poor recording can increase risk, weaken accountability and undermine the young person's voice.

Records must include:

101. date, time, location and names/roles of people present;
102. what was seen, heard, said or disclosed, including exact words where possible;
103. visible injuries, demeanour, emotional presentation and immediate safety needs;
104. what action staff took to protect, support, de-escalate or seek help;
105. who was informed, when, how, and what advice or instruction was received;
106. referral forms, emails, incident forms, telephone notes and follow-up actions;
107. the young person's wishes, feelings and preferred support where safe and appropriate;
108. updates to risk assessments, support plans, safety plans, missing plans or placement plans;
109. management review, learning, supervision or debriefing outcomes.

Records must avoid judgemental labels. Instead of saying a young person was manipulative, attention-seeking, non-compliant or promiscuous, staff must describe what happened factually, what may be causing concern, what risk is indicated and what support or safeguarding action followed.

RISK ASSESSMENT, SUPPORT PLANNING AND PREVENTION

Safeguarding is not only reactive. Each young person must have current plans that identify known and emerging risks, protective factors, triggers, strengths, trusted adults, communication needs, missing risks, exploitation risks, health needs, online safety needs and strategies that help them stay safe.

- 110. review risk assessments after any safeguarding concern, disclosure, missing episode, police contact, exploitation concern, incident, complaint, allegation or significant change;
- 111. include the young person's voice and realistic safety strategies wherever possible;
- 112. ensure staff know the plan before working with the young person;
- 113. use key work and one-to-one sessions to build understanding of consent, healthy relationships, online safety, community safety, emotional regulation, substance risks, money safety and how to seek help;
- 114. review location risk assessments at least annually and sooner where local risks change, including exploitation hotspots, unsafe addresses, transport routes and community concerns.

MISSING EPISODES AND RETURN HOME SUPPORT

Going missing can be a safeguarding indicator and may be linked to exploitation, fear, relationship difficulties, trauma, substance use, mental health crisis, family pressure or unsafe peer networks. Staff must follow the Missing Young Person Policy and any individual missing plan.

- 115. act immediately according to the young person's risk plan and missing procedure;
- 116. try to contact the young person in a calm, non-shaming way and encourage safe return;
- 117. inform the police, social worker, placing authority, EDT and managers according to risk and procedure;
- 118. record times, actions, contact attempts, information from peers/professionals and any locations of concern;
- 119. on return, check physical and emotional safety, medical needs, injuries, exploitation indicators and immediate support needs;
- 120. ensure the young person is offered an independent return home interview where required and that learning updates the support and risk plans.

ONLINE SAFETY AND TECHNOLOGY

Online harm must be treated with the same seriousness as offline harm. Technology may be used to groom, coerce, exploit, harass, threaten, radicalise, track, blackmail or control young people.

- 121. support young people to understand privacy, consent, image sharing, digital footprints, scams, coercion, sexual extortion and safe reporting;
- 122. do not view, download, forward or print indecent images of children. Preserve information by recording what was reported and seek police/social worker advice;
- 123. record usernames, platforms, times, threats, contact details and screenshots only where lawful, necessary and advised by safeguarding procedures;
- 124. consider whether online harm creates immediate risk in the physical world, including unsafe meetings, blackmail, trafficking, exploitation or self-harm.

BEHAVIOUR, POLICE INVOLVEMENT AND AVOIDING UNNECESSARY CRIMINALISATION

Some safeguarding concerns involve behaviour that is risky, harmful or distressing. Team members must maintain boundaries and protect others while remembering that behaviour may reflect trauma, fear, coercion, developmental need, exploitation or emotional dysregulation.

- 125. use de-escalation, regulation, calm communication and practical support wherever safe;
- 126. involve police immediately where there is serious harm, immediate danger, a weapon, a serious offence, a missing episode requiring police action, exploitation, trafficking or urgent protection need;
- 127. where police involvement is not urgent, consult the Registered Manager/DSL and relevant professionals so responses are proportionate and do not unnecessarily criminalise looked after young people;
- 128. record the reasons for police involvement or the reasons for alternative safeguarding action.

SAFER RECRUITMENT, TRAINING AND SUPERVISION

Independent Horizons will use safer recruitment and suitability checks to reduce the risk of unsuitable adults working with young people. Recruitment processes must include safeguarding statements, application scrutiny, identity and right-to-work checks, employment history checks, references, appropriate DBS and barred list checks, safeguarding interview questions and probationary oversight.

All team members must receive safeguarding induction before lone working and regular safeguarding training thereafter. Training must cover this policy, abuse and neglect, exploitation, online safety, missing episodes, allegations, information sharing, recording, trauma-informed practice, professional boundaries, whistleblowing, Prevent and local safeguarding procedures.

Supervision must include safeguarding reflection, case discussion, staff wellbeing, professional curiosity, recording quality, risk-plan effectiveness and learning from incidents. Staff must be offered debriefing after serious, complex or distressing safeguarding events.

WHISTLEBLOWING AND ESCALATION OF POOR PRACTICE

Young people are safer when staff feel able to raise concerns. All team members have a duty to report unsafe practice, poor safeguarding responses, boundary concerns, bullying, discrimination, failures to record, failures to refer, misuse of power or any conduct that may place young people at risk.

- 129. raise concerns with the Registered Manager where safe and appropriate;
- 130. use the Nominated Individual, Operations Director, LADO, placing authority, Ofsted, police or NSPCC whistleblowing advice line where internal routes are unsafe, conflicted or ineffective;
- 131. record concerns factually and keep copies of advice where appropriate;
- 132. do not ignore or minimise a concern because it involves a colleague or senior person.

COMMUNICATION WITH YOUNG PEOPLE

Young people must know how to get help, make a complaint, speak to an advocate, contact their social worker, raise a safeguarding concern and contact emergency services. Information must be provided in a way the young person can understand, including reasonable adjustments for language, disability, neurodivergence, literacy or communication needs.

- 133. explain safeguarding, confidentiality and complaints during admission and key work;
- 134. display or provide accessible contact details for staff, social workers, advocacy, complaints, emergency services and helplines;
- 135. ask young people regularly whether they feel safe in the accommodation, local area, relationships, education and online;
- 136. include young people's feedback in quality of support reviews and policy learning.

CONTACTS AND ESCALATION ROUTES

Role/service	Name/contact	When to use
Registered Manager / Designated Safeguarding Lead	Karen Burton	Confirm telephone number and operational safeguarding inbox before issue.
Nominated Individual	Karen Burton	Responsible for senior oversight and Ofsted notification assurance.
Operations Director	Gary Burton	Senior operational escalation and cover arrangements.
Senior Support Worker	Michael Robinson	Shift-level support, immediate advice and escalation to the Registered Manager/DSL.
Children's social care / placing authority	Young person's allocated social worker or Emergency Duty Team	Use the contact details recorded in the young person's placement, care/pathway and risk plans.
Police or ambulance	999	Immediate danger, serious injury, urgent medical risk, crime in progress or immediate threat to life.
Local Authority Designated Officer (LADO)	Relevant local authority LADO	Allegations against adults working with children or concerns meeting the harm threshold.
NSPCC whistleblowing advice line	0800 028 0285	For staff who need independent advice about raising safeguarding concerns.

MONITORING, AUDIT AND REVIEW

The Registered Manager and Nominated Individual will monitor safeguarding practice through supervision, team meetings, case file audits, incident reviews, training records, staff feedback, young person feedback, complaints, allegations, missing episode analysis, exploitation indicators, LADO advice, Ofsted feedback and quality of support reviews.

This policy will be reviewed at least annually and sooner if legislation, regulations, statutory guidance, local safeguarding procedures, Ofsted expectations, serious incident learning or service arrangements change.

REFERENCES

137. The Supported Accommodation (England) Regulations 2023.
138. Department for Education, Guide to the supported accommodation regulations including quality standards.
139. Department for Education, Working Together to Safeguard Children 2026: a guide to multi-agency working.
140. Ofsted, Social care common inspection framework: supported accommodation.
141. Children Act 1989 and Children Act 2004.
142. Care Standards Act 2000.
143. Care Planning, Placement and Case Review (England) Regulations 2010.
144. Children (Leaving Care) Act 2000 and relevant leaving care regulations and guidance.
145. Equality Act 2010, Human Rights Act 1998, UK GDPR and Data Protection Act 2018.
146. Safeguarding Vulnerable Groups Act 2006.
147. Sexual Offences Act 2003, Modern Slavery Act 2015, Domestic Abuse Act 2021 and Counter-Terrorism and Security Act 2015.
148. Local safeguarding children partnership procedures applicable to each accommodation setting.

COMPLIANCE AND UPDATE NOTES

149. Updated references from Working Together 2023/2018 to Working Together to Safeguard Children 2026.
150. Strengthened alignment with the Supported Accommodation (England) Regulations 2023, especially Regulations 5, 20, 24-27 and 32.

- 151. Added clearer operational steps for reporting, recording, disclosures, third-party concerns, allegations against adults, information sharing and emergency escalation.
- 152. Reframed language to be trauma-informed, child-centred and suitable for looked after young people aged 16 and 17 in supported accommodation.
- 153. Clarified that 16 and 17 year olds remain children in law and that independence-building must be balanced with safeguarding action.
- 154. Reduced reliance on adult safeguarding references except where transition or adult services may be relevant.

This draft is not legal advice. It should be reviewed and approved by the Registered Manager/Nominated Individual and checked against local safeguarding partnership procedures before formal issue.

OPEN POINTS REQUIRING CONFIRMATION

- 155. Confirm the current named Registered Manager, Nominated Individual, Operations Director, Senior Support Worker and any deputy DSL arrangements before issue.
- 156. Confirm local authority, LADO, EDT, police non-emergency, safeguarding partnership and advocacy contact details for each accommodation setting.
- 157. Confirm whether Independent Horizons uses CCTV or other monitoring equipment and ensure the separate monitoring policy reflects Regulation 6 and privacy requirements.
- 158. Confirm internal form names, recording systems, timescales and notification workflow so the procedure matches day-to-day practice.
- 159. Confirm review and approval dates before publishing the final signed version.

Approved by:

Karen Burton, Registered Manager / Nominated Individual

Signature: _____ Date: _____