



Safeguarding Policy

Version 5.0



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Version Control

VERSION	REVIEWER NAME	DATE	NEXT REVIEW	COMMENTS
1.0	Rena Panesar	Oct 2021	Oct 2022	First Policy.
2.0	Rena Panesar	Oct 2022	Oct 2023	Updated
3.0	Rena Panesar	Oct 2023	Oct 2024	Updated
4.0	Rena Panesar	Oct 2024	Oct 2025	Updated.
5.0	Policy Pros	Oct 2025	Oct 2026	Retemplated and updated to also include safeguarding children.



Introduction

Pathways LDN is committed to providing a safe and supportive environment where all learners and stakeholders, regardless of their background, age, or circumstances, feel safe and secure.

Purpose

This policy is designed to clearly outline the statutory duties and operational procedures for safeguarding and promoting the welfare of all individuals who engage with Pathways LDN. It serves the following critical objectives:

- **Statutory Compliance:** To ensure full adherence to all UK safeguarding legislation, including the **Children Act 1989/2004** and the statutory guidance outlined in **Keeping Children Safe in Education (KCSIE 2025)** and **Working Together to Safeguard Children (2023)**.
- **Prevent Harm:** To establish rigorous procedures for identifying, reporting, and responding to all forms of abuse, neglect, exploitation, and radicalisation at the earliest opportunity, thereby protecting learners (children and vulnerable adults) and vulnerable stakeholders from harm.
- **Promote Welfare:** To proactively foster a safe, supportive, and inclusive learning environment where the welfare and best interests of the child or vulnerable adult are paramount in all decisions.
- **Define Accountability:** To clearly define the roles and responsibilities of the Board, the Designated Safeguarding Lead (DSL), and all staff members in the safeguarding process, ensuring a consistent and effective whole-organisation approach.

Who and What This Policy Applies To

This policy applies to all staff and also applies to all Pathways LDN stakeholders, including:

- Learners
- Parents/guardians of our learners
- Anyone else who engages with our services or who comes into contact with our staff



Legal and Statutory Framework

This policy is governed by and fully aligned with the requirements of:

Safeguarding Children: In the UK, there are multiple pieces of legislation underpinning the safeguarding of children, including The Children Act 1989 (as amended), The Children and Social Work Act 2017, The Safeguarding Vulnerable Groups Act 2006, Working Together to Safeguard Children 2023 (Updated 2024) and Keeping Children Safe in Education 2024 (KCSiE) (described below).

Safeguarding Vulnerable / At-Risk Adults: Under the Care Act 2014, Local Authorities are responsible for protecting at-risk and vulnerable adults and investigating safeguarding reports. This act works alongside multiple other UK legislation and acts, including the Children and Families Act 2014, Mental Capacity Act 2005, Safeguarding Vulnerable Groups Act 2006, Sexual Offences Act 2003 and many more.

The Department for Education (DfE) Guidance and Statutory Guidance: Keeping Children Safe in Education (all staff must read and understand Part 1 and Annex A of this guidance), Working Together to Improve School Attendance, Prevent Duty Guidance, Data protection in schools, Filtering and Monitoring Standards, Guidance on the Use of Generative AI in Education, etc.

Equality and Diversity Statement

Pathways LDN is committed to protecting from harm all individuals without exception, regardless of age, gender, marital status, family or caring responsibilities, gender identity, ethnicity, disability, sexual orientation, religion or belief.



Roles and Responsibilities

Directors (as Designated Safeguarding Lead and Deputy)

- Set and review the safeguarding policy, procedures, risk assessment, and annual training plan.
- Act as first and second points of contact for concerns, give advice to staff, and decide on referrals to the local authority, Channel, police, or other agencies.
- Maintain up-to-date contact details for local safeguarding partners.
- Oversee safer recruitment, DBS and barred list checks, references, induction, supervision, and ongoing training for all roles, including contractors and volunteers.
- Ensure proportionate online safety measures, visitor controls, trip and placement checks, and clear rules for one-to-one contact and physical intervention.
- Quality assure safeguarding practice through case audits, incident reviews, and data on trends such as attendance concerns, online harms, and placement risks.
- Ensure secure recording and lawful information sharing, with timely notifications to funders or regulators where required.
- Lead the management of allegations and low-level concerns about staff.

Staff

- Complete safeguarding and Prevent training at induction and refresh regularly; follow safer working practice, online conduct, and confidentiality rules.
- Remain alert to signs of abuse, neglect, and exploitation, radicalisation, bullying or harassment, including online indicators and risks that can arise on work placements.
- Act immediately on concerns and follow the procedure.
- Maintain accurate records.
- Share information on a need-to-know basis in line with guidance and organisational procedures; escalate if a response is not timely or effective.
- Cooperate with external agencies and internal reviews, complete actions from case learning, and use the whistleblowing route if needed.



Overarching Policy

Designated Safeguarding Lead (DSL) and Deputy DSL (DDSL)

In line with statutory guidance from Keeping Children Safe in Education (KCSIE 2025), Pathways LDN has appointed a Designated Safeguarding Lead (DSL) who is responsible for managing all day-to-day safeguarding concerns and ensuring the effective implementation of this policy.

The DSL and Deputy DSLs serve as the primary point of contact for all staff, learners, and external agencies regarding safeguarding and child protection.

Contact Details

DSL

Email: rena@pathwaysldnlimited.com

Telephone: 07982906672

DDSL

Email: paul@pathwaysldnlimited.com

Telephone: 07508114160

Safer Recruitment and Staff Suitability

Pathways LDN is committed to safeguarding learners through rigorous and systematic adherence to safer recruitment practices, ensuring that all staff and associated personnel are suitable to work with children and vulnerable adults. This process is fully compliant with Keeping Children Safe in Education (KCSIE 2025) and Ofsted.

Pre-Appointment Checks

Before any individual commences work or unsupervised contact with learners, a comprehensive set of mandatory pre-appointment checks must be completed and recorded. These include:

- **Identity Checks (ID Checks):** Verification of the individual's identity (usually photographic ID) and their right to work in the UK.
- **Barred List and DBS Checks (with barred list check if required):** All staff whose work involves regulated activity must obtain an enhanced Disclosure and Barring Service



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(DBS) certificate and undergo a check against the DBS Children's Barred List. This type of check is mandatory for staff working directly with under-18s.

- **References:** A minimum of two satisfactory professional references must be obtained directly from previous employers, one of which must be from the most recent employer. Any gaps in employment history must be investigated and satisfactorily resolved.
- **Disqualification:** Checking whether staff are subject to any sanctions or restrictions imposed by a professional body (e.g., the Teaching Regulation Agency).
- **Online Checks:** For shortlisted candidates, appropriate **online searches** may be conducted as part of due diligence to identify any information that is publicly available that may indicate unsuitability to work with children.

This requirement extends to individuals not directly employed by Pathways LDN:

- **Subcontractors and Partners:** We require written confirmation that all staff engaged by subcontractors or employer-partners to deliver training or supervise apprentices have undergone equivalent suitability checks and DBS clearance where appropriate. Pathways LDN remains ultimately responsible for the safeguarding of learners placed with alternative providers.

For further information, please refer to our Safer Recruitment Policy.

Staff and Designated Safeguarding Lead Training

Pathways LDN is committed to ensuring that all staff are fully trained and equipped to fulfil their safeguarding responsibilities, in line with the statutory requirements of Keeping Children Safe in Education (KCSIE 2025).

All Staff Training

- **Induction Training:** All new staff, tutors, and mentors must receive comprehensive safeguarding and child protection training as part of their induction process. This training must cover this policy, the KCSIE framework, the Prevent Duty, and the specific risks associated with online and workplace environments.
- **Annual Refresher Training:** All staff must receive safeguarding and child protection (including online safety) updates at least annually. These sessions ensure knowledge remains current and reflects any new DfE guidance or emerging local threats.



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Designated Safeguarding Leads (DSL) Training

The DSL and Deputy DSLs require more advanced and specialised training to carry out their strategic duties:

- **Core Training:** The DSL and DSSL will undergo training (at least to Level 3) that provides a good understanding of their role, how to identify, understand, and respond to specific needs of children and vulnerable adults, and the processes and responsibilities of external agencies.
- **Refresher Training:** The DSL's knowledge and skills will be refreshed at regular intervals, as required, and at least annually, to ensure they are fully up-to-date with any developments relevant to their role.

Staff Supervision and Support

Pathways LDN is committed to ensuring that all staff receive regular, structured support and supervision to promote good professional practice, uphold stringent safeguarding standards, and support personal development.

All paid staff are provided with supervision sessions at scheduled intervals with their line manager. These sessions are used to review performance, discuss any concerns, and reflect critically on safeguarding responsibilities and professional challenges.

This structured approach ensures that all individuals working with learners are well-equipped, supported, and confident in recognising and responding to safeguarding concerns appropriately.

Contextual Safeguarding

Contextual Safeguarding is an approach that recognises that young people can experience significant harm and abuse *outside* of their families and homes, often within their communities, education providers, or online spaces. It expands the traditional focus of safeguarding to include the settings and social networks where young people spend time.

It requires staff to understand how influences like bullying, youth violence, and exploitation (such as County Lines) operate within these external contexts to put learners at risk, as well as actively assessing and acting upon the risks posed by peer groups, employer workplaces, subcontractors, and the digital environment.



Conduct and Relationships

Bullying

Bullying is defined as offensive, intimidating, malicious, or insulting behaviour, or an abuse or misuse of power, which undermines, humiliates, or injures the person on the receiving end. This includes name-calling, 'banter', hitting, pushing, spreading rumours, threatening, or undermining someone.

Pathways LDN operates a zero-tolerance policy towards bullying of any kind, regardless of who is involved. Any individual found to be bullying or harassing a learner or staff member may face disciplinary action or an appropriate sanction. This prohibition includes online bullying via any means.

Please see our Anti-Bullying and Harassment Policy for further information.

Relationships, Health Education, and Well-being

Although Pathways LDN does not provide sex education, we are committed to promoting the personal development, well-being, and safeguarding of all learners through the core principles of the DfE's statutory guidance on Relationships and Sex Education and Health Education. Our focus is on equipping learners with the essential knowledge and attributes needed to build safe and successful relationships in their professional and personal lives.

- We are clear on consent and setting healthy personal boundaries, which are vital in the learning environment, the workplace and social settings.
- We actively address issues of sexual harassment and sexual violence. This includes ensuring learners understand how to identify, report, and seek help concerning these behaviours, aligning with safeguarding standards.
- We promote a culture of respect by making learners aware that any kind of discrimination or harassment is unacceptable and reinforcing that every Pathways LDN stakeholder must be respectful to others, regardless of their protected characteristics, backgrounds, or life choices.



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Sexting

- Sexting refers to 'youth-produced sexual imagery.'
- We will ensure learners are made aware of the legal, social, and moral issues around sexting. Learners will be encouraged to report all incidents of sexting.

Online and Digital Safety

Training and Curriculum

- It is important that our learners are sufficiently empowered with the knowledge to stay as risk-free as possible whilst using digital technology. This includes updated awareness of new and emerging issues, including sexual exploitation and extremism.
- As such, Pathways LDN Ltd will provide information to learners regarding e-safety on request and promote e-safety where possible (e.g., via bulletins posted in newsletters and e-portfolios).
- Consideration will be given to the delivery of key messages to learners with additional learning support or a disability, including specific examples for those issues directly relating to them.
- E-safety for learners is embedded into induction, and wherever ICT is used at Pathways LDN Ltd, staff will ensure that there are positive messages about the safe use of technology and risks as part of the learner's training and development.
- Should any member of staff feel they have had inadequate or insufficient training generally or in any particular area, this must be brought to the attention of the Directors, who will arrange appropriate support.

Please note that E-Safety teaching will now also cover misinformation, disinformation (including fake news) and conspiracy theories (in addition to other known risks related to content, contact, conduct and commerce). Staff are trained to recognise that online exposure to misinformation, disinformation, and conspiracy theories is a form of content risk and a potential indicator of radicalisation or extremism.



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Safer Practice in Virtual Sessions

- Before engaging with a child, young person or vulnerable adult who cannot legally give informed consent themselves, written permission will be obtained from their parent or legal guardian.
- When working with younger children, parents or guardians will be encouraged to remain present on the video call or remain nearby to provide supervision (and reassurance as required).
- All virtual sessions will be conducted via secure, agreed platforms with appropriate privacy settings enabled.
- Staff must maintain professional boundaries at all times and must not share personal contact details.
- Where possible, sessions should be recorded (with consent) to provide an audit trail.
- Appropriate dress, language, and conduct must be maintained at all times.

Digital Media and Imagery

- Images focusing on individuals are personal data and must be controlled and processed as per the GDPR Data Security Policy. Learners should not share images of others without their permission, nor share inappropriate images containing violence, nudity, sexual content, graphic detail, or anything which could be considered harmful.
- Staff and learners must ensure that mobile phones and hand-held devices are used in accordance with the Pathways LDN codes of conduct and related policies.

Use of the Internet and Online Software

- The use of the internet and our online learning software applications and systems will be granted to learners upon enrolment.
- Learners must use the internet and our software systems wisely and must not access or share inappropriate content.
- Learners are provided with information on acceptable use on induction.



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Social Media

- There are many social networking services available, and Pathways LDN is fully supportive of social networking as a tool to engage and collaborate with prospective learners and to engage the wider community. However, it must be used appropriately.
- Again, learners are provided with information on acceptable use on induction.
- Staff are also made aware of our policy on the use of social media.

Filtering and Monitoring

Whilst Pathways LDN does not provide a physical base for learners to train at, learners may access the internet at our centre, at their respective apprenticeship or work placements or on company devices.

Therefore, we will:

- Ensure that our office/centre Wi-Fi has appropriate filtering and monitoring software; and
- Ensure that our learner-used devices have appropriate filtering and monitoring software installed on them (which meets Department for Education standards); and
- Work with employers to ensure that appropriate filtering methods are in place to ensure that learners on placements are safe from all types of inappropriate and unacceptable materials (including those generated by AI products and systems), including terrorist and extremist material.

In addition, making them aware of their duty to:

- Report all concerns to our Designated Safeguarding Lead (or Deputy).
- Review filtering and monitoring provisions at least annually and align with current best practice (also including the new AI safety expectations).
- Block harmful and inappropriate content without unreasonably impacting teaching and learning (including for those who bring their own devices).
- Have effective monitoring strategies in place that meet their safeguarding needs (both technological and physical).



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Any filtering should and will not "overblock" but will ensure that those systems, networks and devices will not have access to potentially harmful and inappropriate online material.

Where Pathways LDN provides access to generative artificial intelligence (AI) products and systems, these will be safely managed in line with the new Department for Education guidance in terms of filtering and monitoring:

<https://www.gov.uk/government/publications/generative-ai-product-safety-expectations/generative-ai-product-safety-expectations>.

The Directors will ensure that all "flagged" searches and/or the action of generating or accessing harmful and inappropriate content are immediately acted upon.

The user will also be alerted to the breach and signposted to appropriate guidance and support resources.

Our Directors and Senior Leadership Team will ensure that:

- Appropriate filtering and monitoring systems are procured in accordance with a risk assessment (considering the user's needs – e.g., related to SEND); and
- All decisions to block content are recorded and justified; and
- The effectiveness of our provision is regularly reviewed (at least annually or when a safeguarding concern or risk is identified); and
- All reports (including those generated to highlight trends on access and attempted access of prohibited content) are overseen by the Designated Safeguarding Lead and Deputy.

Radicalisation and Extremism

Pathways LDN ensures staff and learners are safe from terrorist and extremist material when accessing the internet. If a concern arises, staff and learners will know who to go to and should inform the DSLs, who will act according to the Safeguarding and Child Protection Policy and the guidance outlined in the Prevent and Channel Duty Guidance.

Please see our E-Safety Policy for further information.



Safeguarding Children and Child Protection Policy

Definitions

Children: A child is defined as anyone who has not yet reached their 18th birthday.

Young People: A young person is a person between 16 and 18 years of age. Young people have certain rights, but are still considered children.

Child protection guidance points out that even if a child has reached 16 years of age and is living independently, in further education, a member of the armed forces, in hospital or in custody in the secure estate, they are still legally children and should be given the same protection and entitlements as any other child (Department for Education, 2023).

For the purposes of this policy and in line with **Working Together to Safeguard Children (2023)**, **safeguarding and promoting the welfare of children** is defined as:

- **Protecting children** from maltreatment, whether that is within or outside the home, including online.
- **Preventing impairment** of children's mental and physical health or development.
- **Providing help and support** to meet the needs of children as soon as problems emerge.
- **Taking action** to enable all children to have the best outcomes.

Types of Abuse, Neglect and Exploitation – Children

What is Abuse?

Generally, abuse can be defined as:

"a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill-treatment that is not physical, as well as the impact of witnessing ill-treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children." (KCSiE 2024)



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Types of Abuse, Neglect and Exploitation

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.

Sexual abuse: a form of abuse which involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Emotional abuse: the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children to frequently feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of



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inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child-on-child abuse: which is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth-produced sexual imagery)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Radicalisation: Radicalisation (the process of a person legitimising support for, or use of, terrorist violence) is a gradual process where a child or young person may be groomed online or in person, manipulated, exploited, or exposed to extremist views and harmful material, sometimes without realising what they are being drawn into. While anyone can be radicalised, some factors can increase vulnerability, such as low self-esteem, isolation, grief, a strong need for belonging, or feelings of discrimination and injustice. These factors do not



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always lead to radicalisation, but where it occurs, a young person's behaviour may become increasingly centred around an extremist ideology, group, or cause. Signs can include spending more time engaging with people who hold extreme views (online or offline), changes in appearance, losing interest in other friendships and activities, possessing extremist symbols or materials, or attempting to recruit others (Home Office, 2020).

Child criminal and/or sexual exploitation (CCE and CSE): forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Domestic abuse: Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse as they may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (if they are over 16 and are themselves a victim of domestic abuse).

Female genital mutilation: the non-medical practice of partially or fully removing or injuring the external female genitalia. It is a procedure often carried out on girls and young women, typically under the age of 15, as a cultural or social practice with no health benefits. In the UK, FGM is considered a form of child abuse, recognised as a severe violation of human rights and a criminal offence under the Female Genital Mutilation Act 2003.

Forced marriage: involves a child or young person being coerced, threatened, or manipulated into marriage without their free and informed consent. It is illegal in the UK, and the Forced Marriage (Civil Protection) Act 2007 provides protective orders for those at risk. Unlike arranged marriage, where both parties consent, forced marriage deprives a child of their right to choose and may involve emotional, physical, or financial abuse.

Gender and Honour-based violence: a type of violence that is perpetrated in the name of protecting or restoring the perceived "honour" of an individual, family, or community. It can include various forms of abuse—such as physical assault, emotional abuse, threats, or even homicide—often targeted at individuals who are seen as bringing shame to their family or not conforming to traditional gender roles.

This list is not exhaustive.



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Please refer to the following if you would like more information:

- Hillingdon Safeguarding Partnership website: <https://hillingdonsafeguardingpartnership.org.uk/professionals/useful-guidance/>
- The NSPCC: <https://www.nspcc.org.uk/keeping-children-safe/types-of-abuse/>

Procedure

What to do if you have concerns about a child or young person

All staff must:

1. In an emergency (if any child is in immediate danger), call the Police on 999 and continue with the process as appropriate.
2. If medical assistance is required, phone for an ambulance on 999.
3. Report their concerns to the DSL or DDSL, who will make a safeguarding referral to the local authority if one is required, and may also contact the Police.

Do I need consent to report abuse or a concern?

Safeguarding concerns about children (under 18s) must always be taken seriously and acted upon promptly. In most cases, **you do not need the child's consent to report a safeguarding concern.**

It is always better to (where appropriate and safe), explain to the child or young person what you are going to do and why, using language they can understand. If they are able to understand what you are going to do, you may even ask for their consent to share your concern, but **never** promise confidentiality, as the welfare of the child is the paramount concern (Children Act 1989). Therefore, if a child is at risk of significant harm or a serious crime may be prevented, you have a **legal and moral duty** to report the concern, regardless of whether the child or young person agrees.

Remember, data protection legislation does not stop you from making a report where necessary!



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What if the DSL/DDSL is Unavailable?

It is always better to make a referral to the Local Authority than to let a concern go unreported. Therefore, staff should use this document to guide their decision as to whether they should refer the matter to the authorities and always air on the side of caution and make the referral if they have any nagging doubt.

Should I tell the parents/guardians?

Best practice shows that parents/guardians should be notified of the intended referral if the organisation has contact with them, and it is appropriate to do so, although only if doing so would not put the child or young person at further risk of harm.

The following are circumstances where disclosure to the parent, guardian or guardian is **not** appropriate:

- Where sexual abuse or sexual exploitation is suspected.
- Where organised or multiple cases of abuse are suspected.
- Where Fabricated or Induced Illness (previously known as Munchausen Syndrome by Proxy) is suspected.
- Where Female Genital Mutilation is the concern.
- In cases of suspected Forced Marriage.
- Where it would place a child or young person, yourself, or others at immediate risk.

Dealing with Disclosures

- Listen carefully to what you are told without displaying shock or disbelief.
- Be observant and attentive without being judgmental.
- Ask open questions which will encourage the child or young person to talk openly.
- Do not 'fill in the blanks' or add your own words or thoughts. Use the child/young person's own words, even if they use slang language or swear.
- If you can, take notes, but if this will stop the child/young person talking, stop and take notes as soon as possible afterwards and be as accurate as you can.
- Do not criticise the perpetrator.



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- Do not touch the child or young person to comfort or reassure them.
- Do not ask the child or young person to repeat it all for another colleague.
- Explain what you have to do next and who you have to talk to, and encourage them to accept the steps that have to be taken next.

Remember:

- Reassure the child or young person, but DO NOT make promises that you may not be able to keep, e.g. 'everything will be alright' or 'I won't tell anyone', and DO NOT promise confidentiality.
- It is not your job to investigate; this can only be done by the relevant agencies, such as the police or social care. You should only ask enough to establish the nature of the disclosure.
- In an emergency (if a child is in immediate danger), always contact the police by dialling 999.



Safeguarding Vulnerable Adults Policy and Procedure

Definitions

An at-risk or vulnerable adult is defined as someone aged 18 years or over who, according to paragraph 42.1 of the Care Act 2014:

- has care and support needs
- is experiencing, or is at risk of, abuse or neglect
- as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

If someone has care and support needs but is not currently receiving care or support from a health or care service, they may still be an adult at risk.

Types of Abuse – Adults

Adult safeguarding concerns may relate to the following:

Physical Abuse: Deliberately hurting an adult, causing injuries such as bruises, broken bones, burns or cuts, or otherwise causing harm. It could also be when a carer makes up the symptoms of or deliberately brings on an illness or misuses medication.

Sexual Abuse: Any sexual activity, including rape and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Psychological or Emotional Abuse: Includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyberbullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.

Neglect and Acts of Omission: The ongoing failure to meet basic needs; includes ignoring medical or physical care needs, failing to provide access to appropriate health, care and support or educational services, and withholding the necessities of life, such as medication, adequate nutrition, and heating.

Financial and Material Abuse: The theft or misuse of money (including benefits), property or personal belongings, taken without consent or under pressure, including in connection with wills, property, inheritance or financial transactions.



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Organisational Abuse: Includes neglect or poor care practice within an organisation or specific care setting and may range from one-off incidents to ongoing ill-treatment.

Discriminatory Abuse: Includes forms of harassment and discriminatory treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation.

Self-neglect: The lack of self-care, lack of care for one's environment, and/or the refusal of services to the extent that it threatens personal health and safety. This includes behaviours such as hoarding.

Domestic Abuse: Includes any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of gender or sexuality. It also includes so-called 'honour-based' violence, female genital mutilation and forced marriage.

Modern Slavery: Where an individual is exploited, forced to work, or sold. It involves the recruitment and movement of individuals using threats, deception and coercion for the purpose of exploitation.

Criminal Exploitation: Criminal exploitation involves the manipulation or coercion of vulnerable adults to participate in criminal activities for the benefit of others. This can include financial exploitation, forced drug trafficking, or "cuckooing," where criminals take over the home of a vulnerable adult to carry out illegal activities.

Radicalisation: Radicalisation in adult safeguarding refers to the process by which a vulnerable adult is encouraged to adopt extremist views or support terrorism, which may lead to harmful or violent behaviours.

Procedure

What to do if you have concerns about a vulnerable or at-risk adult

All staff must:

1. In an emergency (if someone is in immediate danger), call the Police on 999 and continue with the process as appropriate.
2. If medical assistance is required, phone for an ambulance on 999.
3. Report their concerns to the DSL or DDSL, who will make a safeguarding referral to the local authority if one is required, and may also contact the Police.



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Do I need consent to report abuse or a concern?

Unlike children, adults have a general right to independence, including control over information about themselves. Therefore, every staff member **MUST** try to gain consent from an adult before sharing information outside of Pathways LDN. **However:**

- The law **DOES NOT** prevent the sharing of sensitive, personal information within organisations where there is a legitimate need to know.
- The law **DOES NOT** prevent the sharing of sensitive, personal information between organisations (e.g., with the Police or Social Services) if the adult is believed to lack capacity.
- The law **DOES NOT** prevent the sharing of sensitive, personal information between organisations, even without consent, where the public interest served outweighs the public interest served by protecting confidentiality. For example, if sharing may prevent a serious crime.

Involving the Adults' Family

Where the adult has the capacity to make decisions about safeguarding concerns, the involvement of family, friends or carers should be agreed with the adult. In any case where the adult does not have mental capacity, family, friends, or carers (or the individual who has lasting power of attorney) must be consulted in accordance with the Mental Capacity Act 2005.

Think Family

Everyone has a responsibility to take a 'Think Family' approach.

Think: If an adult is at risk, are others in the household or family (including children) also at risk, and would a referral to children's services (Early Help or the Children's Safeguarding Team) be appropriate?

What if the DSL is Unavailable?

It is always better to make a referral to the Local Authority than to let a concern go unreported. Therefore, staff should use this document to guide their decision as to whether they should refer the matter to the authorities and always air on the side of caution and make the referral if they have any nagging doubt.



Safeguarding Referral Contact Details

Concerns about a Child (Under 18)

Service	Contact Details	When to Use
Stronger Families Hub (MASH)	01895 556006	All child protection referrals by a professional during office hours and out of hours.
Emergency (Imminent Danger)	999 (Police)	Use if the child is in immediate danger.
Non-Urgent Advice/Information	Email: strongerfamilieshub@hillington.gov.uk	For non-urgent information or advice (must be followed up by a phone call if a referral is necessary).

Concerns about an Adult (18+)

Service	Contact Details	When to Use
Social Care Direct	01895 556633 (Office Hours: Mon-Fri, 8 am–6 pm)	To report any concerns about abuse, neglect, or self-neglect of an adult at risk.
Out-of-Hours Emergency Duty Team	01895 250111	For urgent adult safeguarding concerns that require an immediate response outside of normal office hours.
Online Form	Online Safeguarding Adults Referral Form (Available on Hillingdon Council's website)	For non-emergency, formal reporting of adult safeguarding concerns.



Other Procedures

Early Help

Early Help means providing support at any point in a young person's life, from the foundation years through to their teenage years, ensuring we meet their needs proactively.

Pathways LDN is committed to providing Early Help to learners as soon as a problem emerges, preventing issues from escalating into significant safeguarding or welfare concerns.

When the need for Early Help is identified, the Designated Safeguarding Lead (DSL) will either refer the learner (or advise them to self-refer) to the Hillingdon MASH.

For more information about why a child or young person may benefit from Early Help, please visit

<https://learning.nspcc.org.uk/safeguarding-child-protection/early-help-and-early-intervention>.

For more advice on our local offer, please see:

<https://hillingdonsafeguardingpartnership.org.uk/professionals/useful-guidance/early-help/>

Managing Allegations Against Our Staff

All allegations of abuse by staff (including self-employed contractors), both present and historical, must and will be taken seriously.

Any and all reports received must **immediately** be reported to the Directors.

Contacting the LADO

The Local Authority Designated Lead (LADO) **must** be contacted within one working day in respect of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.



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Contacting Adult Social Care

If an allegation meets the threshold for adult safeguarding (i.e., the adult who has allegedly been abused has needs for care and support, is experiencing or is at risk of abuse or neglect, and is unable to protect themselves), the Directors will make a referral to the local authority's Adult Social Care team (in the London Borough of Hillingdon).

Contacting the Police

The Police will be contacted if a crime has been committed.

If people are in immediate danger, 999 will be called. Otherwise, a report will be made via 101.

Investigation

Following the report, the business owner will carry out a thorough and impartial investigation into the allegation (where appropriate, following LADO/Police advice so as not to jeopardise any formal investigation).

Suspension

In the short term, consideration may be given to suspending or amending the duties of the accused.¹ The staff member's rights, including fair treatment and confidentiality, will be upheld throughout the process.

Actions Following Investigation

If the allegation is sustained, appropriate action will be taken.

If the allegation is unfounded, the staff member's rights, reputation, and well-being will be appropriately considered.

Contacting the DBS

If a staff member resigns or is dismissed because they have harmed or posed a risk of harm to a child, Pathways LDN has a legal duty to refer that person to the Disclosure and Barring Service (DBS). This referral is made regardless of whether the police prosecute.

¹ Suspension or an adjustment to duties does not in any way imply guilt. It is purely an action to minimise risk.



Record Keeping

Safeguarding records must be legible, factual, timely and accurate records of what was done and why to demonstrate transparent, defensible decision-making.

If consent was requested, the records must reflect whether it was or was not obtained and, if relevant, why a referral was made if consent was withheld.

Safeguarding records will be stored in a confidential and secure cloud-based digital file, only accessible by the DSL, DDSL and those staff members with a legitimate need to know.

Confidentiality and Data Protection

Pathways LDN will ensure that staff will read our Data Protection and GDPR Policy and abide by it, whilst understanding that these laws are not barriers to sharing information in many cases.

Reviewing

Pathways LDN Ltd. is committed to ensuring our policies are effective and up-to-date.

The Directors are responsible for this process and will review this policy at least once a year or more frequently if needed due to changes in laws, regulatory guidance, or best practice.

This policy will be made available in other formats upon request, and all learners are encouraged to speak to any member of staff if they have any questions or require clarification.