

Safeguarding Policy

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Policy Statement and Principles

Pathway CTM makes a positive contribution to a strong and safe community, recognising the right of every individual to stay safe. We believe our children, young people and adults at risk have equal rights to protection, regardless of age, gender, ability, culture, race, language, religion or sexual identity. We understand that all those who work for or on behalf of Pathway CTM have a unique and crucial role to play in shaping and inspiring the lives of children, young people and adults at risk and will report any concerns appropriately.

Pathway CTM comes into contact with children, young people and adults at risk through the provision of mentorship and careers' guidance services to sixth form students in the UK. This includes running events, telephone and conference mentorship.

This policy is one of a series in our integrated safeguarding portfolio and is provided to ensure you are aware of and understand your responsibilities and that of others, towards safeguarding the welfare of children, young people and adults at risk, along with the reporting procedures for safeguarding and student protection concerns. It acknowledges and is in line with the following statutory and departmental advice and guidance;

- [Working Together to Safeguard Children \(2018\)](#)
- [Keeping Children Safe in Education September \(2020\)](#)
- [Equality Act 2010 \(as amended 2018\)](#)
- [Data Protection Act \(2018\)](#)
- [General Data Protection Regulations \(2018\)](#)
- [Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers \(2018\)](#)
- [The Counter-terrorism and Security Act 2015 \(section 26 Prevent duty\)](#)
- [Serious Crime Act \(2015\) \(section B of the Female Mutilation Act 2003 \(as inserted by section 74\)](#)
- [Care Act \(2014\)](#)

Where the procedures contained in this policy refer to 'staff' this means all staff (paid or unpaid), volunteers, and those working in and with our company.

We ensure that everyone working directly with children, reads at least Part one, Part 5 and Annex A of Keeping Children Safe in Education September 2020, Staff Handbook, Safeguarding and Student Protection Policy, Role of the DS and What to do if you're worried a student is being abused.

Policy principles

- Safeguarding is everyone's responsibility
- A student-centred approach
- Welfare of the student is paramount
- All individuals, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All safeguarding concerns will be reported appropriately

Policy aims

- To provide all staff with the necessary training and information to enable them to meet their safeguarding and student protection responsibilities
- To ensure consistent good practice
- To demonstrate Pathway CTM's commitment with regard to safeguarding and student protection to
- children, young people, adults at risk and other partners

Roles and Responsibilities

The Designated Safeguarding Lead (DSL) is **Massimiliano Trapani**

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The Deputy Designated Safeguarding Lead (DDSL) is **Jo Lane**

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It is everyone's responsibility to understand our duty to protect the safety and welfare of children, young people and adults at risk and to know what to do if we are worried a student is being abused.

We will ensure all concerns are recorded and dealt with in a timely manner and put in safeguarding arrangements to minimise the risk of allegations being made.

As staff are in regulated activity, we will ensure that a DBS enhanced, and barred list check is carried out.

CEO: will be responsible to ensure we have effective, up to date, robust safeguarding policies, procedures in place and up to date training and records. Regularly liaise with the designated safeguarding lead and manage any allegations.

Designated Safeguarding Lead (DSL): will take lead responsible for safeguarding and student Protection (including online safety). They will have undergone Designated Safeguarding Lead training to provide them with the knowledge and skills required to carry out their roll and have appropriate status and authority. (see appendix A)

Deputy Designated Safeguarding Lead: any deputies will be trained to the same standard as the DSL.

All staff: will share the company commitment to safeguarding, know who their safeguarding team are, be able to identify and report any concerns around the welfare of a student, young person or adult at risk. Read and acknowledge any safeguarding documents and guidance provided by Pathway CTM.

We expect all staff (paid or unpaid) to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

Definitions

Safeguarding and promoting the welfare of children is defined for the purpose of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Student protection: part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Children: Anyone who has not yet reached their 18th birthday. The fact that a student has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change their status or entitlements to services or protection.

Adult at risk: An adult at risk is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support'

Abuse: a form of maltreatment of a student. Somebody may abuse or neglect a student by inflicting harm or by failing to act to prevent harm. 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 student or children.

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 student. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a student.

Emotional abuse: the persistent emotional maltreatment of a student such as to cause severe and adverse effects on the student's emotional development. It may involve conveying to a student 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 student 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 student's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the student 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 frequently to 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 student, although it may occur alone.

Sexual abuse: involves forcing or enticing a student or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the student 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 student in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 29).

Neglect: the persistent failure to meet a student's basic physical and/or psychological needs, likely to result in the serious impairment of the student's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a student 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 student from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a student's basic emotional needs.

Any student may benefit from early help, but all our staff should be particularly alert to the potential need for early help for a student, young people and adults at risk who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the student, such as drug and alcohol misuse, adult mental health issues and domestic abuse;

Child Protection Procedures

Safeguarding issues

All staff are aware of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

All those working in Pathway CTM follow the relevant local authority's student protection reporting procedures which are consistent with Working Together to Safeguard Children 2018 and What to do if you're worried a student is being abused 2015.

It is **not** the responsibility of the staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All those working directly with children, however, have a duty to recognise concerns and maintain an open mind. Accordingly, all concerns regarding the welfare of students must be immediately reported to the DSL.

Staff must immediately report to the DSL:

- any suspicion that a student is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- any explanation given which appears inconsistent or suspicious
- any behaviours which give rise to suspicions that a student may have suffered harm (e.g. worrying drawings or play)
- any concerns that a student may be suffering from inadequate care, ill treatment, or emotional maltreatment
- any concerns that a student is presenting signs or symptoms of abuse or neglect
- any significant changes in a student's presentation, including non-attendance
- any hint or disclosure of abuse from any person
- any concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present)

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

It is very important that staff report their concerns – they do not need 'absolute proof' that the student is at risk.

If you are concerned about a student, young person or adult at risk's welfare

There will be occasions when staff may suspect that a student may be at risk but have no 'real' evidence.

In these circumstances, staff will try to give the student the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill. It is fine to ask the student if they are OK or if they can help in any way.

All concerns should be reported to the DSL. If the student does begin to reveal that they are being harmed, staff should follow the advice below. Following an initial conversation with the student, if the member of staff remains concerned, they should immediately discuss their concerns with the DSL.

If a student discloses to you

It takes a lot of courage for a student, young person or adult at risk to disclose that they are being abused. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault.

If a student talks to a member of staff about any risks to their safety or wellbeing, the staff member must let the student know they cannot keep the information secret but will keep it private and only pass it on to those who can help them. The point at which they tell the student this is a matter for professional judgement. If they jump in immediately the student may think that they do not want to listen, if left until the very end of the conversation, the student may feel that they have been misled into revealing more than they would have otherwise.

During their conversations with the students' staff will:

- allow them to speak freely
- listen to and take seriously any disclosure or information that a student may be at risk of harm
- remain calm and not overreact – the student may stop talking if they feel they are upsetting their listener
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- try to keep questions to a minimum and of an ‘open’ nature e.g. ‘Can you tell me what happened?’ rather than ‘Did x hit you?’
- not be afraid of silences – remember how hard this must be for the student
- under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the student’s parent think about all this
- clarify the information
- at an appropriate time tell the student that in order to help them, the member of staff or volunteer must pass the information on
- not automatically offer any physical touch as comfort. It may be anything but comforting to a student who has been abused
- try not to show signs of shock, horror or surprise
- not express feelings or judgements regarding any lead alleged to have harmed the student
- explain sensitively to the person that they have a responsibility to refer the information to the DSL
- reassure and support the person as far as possible
- explain that only those who ‘need to know’ will be told
- explain what will happen next and that the person will be involved as appropriate
- avoid admonishing the student for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be the staff member’s way of being supportive but may be interpreted by the student to mean that they have done something wrong
- tell the student what will happen next
- report verbally to the DSL
- write up their conversation immediately and speak with the DSL
- seek support if they feel distressed

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the DSL in order that s/he can make an informed decision of what to do next.

Taking action

Any student, in any family could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.

Key points to remember for taking action are:

- report your concern to the DSL immediately
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- in an emergency take the action necessary to help the student, refer to police or children’s social care
- seek support for yourself if you are distressed.

Action by the DSL

Following any information raising concern, the DSL will consider:

- any urgent medical needs of the student
- speak with the school or college's DSL
- making an enquiry to find out if the student is subject to a Student Protection Plan by ringing the relevant initial contact point or MASH team
- discussing the matter with other multi-agencies
- consulting with appropriate persons e.g. children's social care or police
- the student's wishes

All information and actions taken, including the reasons for any decisions made, must be fully documented. All referrals to children's social care will be followed up in writing within 24 hours following the relevant safeguarding partners guidance documents.

Recording and Monitoring

Accurate records must be made immediately and will clearly distinguish between observation, fact, opinion and hypothesis. Any information given will be recorded verbatim where possible and a note made of the location and description of any injuries seen.

Concerns should be recorded on a cause for concern form they will be signed and dated.

All manual cause for concern forms and/or student protection documents will be retained in a 'Student Protection' file, separate from the student's main file. This will be locked away and only accessible to the safeguarding team.

Initial Action for Safeguarding Concerns or Allegations

The person who has received an allegation or witnessed an event will immediately inform the CEO who will follow Part 4 Keeping Children Safe in Education 2020 guidance if it is alleged that any adult working with students, including supply teachers and volunteers has:

- behaved in a way that has harmed a student, or may have harmed a student;
- possibly committed a criminal offence against or related to a student;
- behaved towards a student or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In the event that an allegation is made against the CEO the matter will be reported to the local area designated officer (LADO).

FURTHER INFORMATION

Abuse of Trust

All staff are aware that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

Pathway CTM's Staff Handbook sets out our expectations of staff and is provided to all staff members at induction.

Student Criminal & Sexual Exploitation (CCE & CSE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a student into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a student into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any student or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the student or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

The department provide: [Student sexual exploitation: guide for practitioners](#)

County Lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, student referral units, special educational needs schools, children's homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a student is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. Further information on the signs of a student's involvement in county lines is available in [Criminal exploitation of children and vulnerable adults: County Lines](#).

Complaints Procedure

Our complaints procedure will be followed where a student or parent raises a concern about poor practice towards a student that initially does not reach the threshold for student protection action. Poor practice examples include unfairly singling out a student or attempting to humiliate them, bullying or belittling a student or discriminating against them in some way. Any complaint will be taken seriously procedures followed by a senior member of as detailed in our Complaints Policy. Complaints from staff are dealt with under grievance and/or disciplinary procedures.

Concerns About a Colleague

Staff who are concerned about the conduct of a colleague towards a student are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the student is paramount. The Whistleblowing Policy enables staff to raise concerns or allegations in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible student abuse by colleagues should immediately be reported to the CEO or discussed with the DSL. Complaints about the CEO should immediately be reported to the DSL.

Staff may also report their concerns directly to local authority children's social care, the police or the NSPCC whistleblowing helpline (0800 028 0285) if they believe direct reporting is necessary to secure action.

Confidentiality and Sharing Information

Pathway CTM has regard to HM Government advice: [Information sharing advice for safeguarding practitioners 2018](#) and those working for and on behalf of the company, will ensure that all data about students is handled in accordance with this guidance.

The company has a clear and explicit Confidentiality Policy. The policy indicates:

- a. when information must be shared with police and children's social care where the student is / may be at risk of significant harm
- b. when the student's and/or parent's confidentiality must not be breached
- c. that information is shared on a need to know basis

Any member of staff who has access to sensitive information about a student must take all reasonable steps to ensure that such information is only disclosed on a 'need to know' basis.

Regardless of the duty of confidentiality, if any member of staff has reason to believe that a student may be suffering harm, or be at risk of harm, their duty is to forward this information without delay to the DSL.

Staff will only discuss concerns with the DSL or CEO (depending on who is the subject of the concern).

That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with the data protection principles of the General Data Protection Regulations, Data Protection Act 2018 and Freedom of Information Act 2000.

Information is:

1. Used fairly, lawfully and transparently
2. Used for specified, explicit purposes
3. Used in a way that is adequate, relevant and limited to only what is necessary
4. Accurate and, where necessary, kept up to date
5. Kept for no longer than is necessary
6. Handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

Written paper documents and other written information will be stored in a locked facility.

Every effort will be made to prevent unauthorised access, and sensitive information should not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store student protection information on portable media, such as a laptop or a flash drive, these items must be encrypted and kept in locked storage.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that others do not have an automatic right to see them. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the CEO or DSL.

The Data Protection Act does not prevent staff from sharing information with relevant agencies, where that information may help to protect a student. The policy on confidentiality is available to staff, parents and students. (Information sharing flowchart in Appendix 2).

Further details on information sharing can be found:

- in Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing
- at [Information Sharing: Advice for Practitioners Providing Safeguarding Services to children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful
- at [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and guidance from the department

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL will consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a student's life that are a threat to their safety and/or welfare.

Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, 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. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

All students can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on student. In some cases, a student may blame themselves for the abuse or may have had to leave the family home as a result.

National Domestic Abuse Helpline

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying students who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse.](#)

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Section 5B of the 2003 Act introduces a mandatory reporting duty which requires teachers - this includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions, in England and Wales to report 'known' cases of FGM in under 18s which they identify in the course of their professional work to the police.

It will be rare for staff to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the staff member has a good reason not to, they should also still consider and discuss any such case with the DSL and involve children's social care as appropriate. All staff are made aware of the indicators of FGM and are requested to undertake training. All concerns are reported immediately to the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons.

The practice is illegal in the UK. FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable
- spending longer than normal in the bathroom or toilet due to difficulties urinating
- spending long periods of time away from a classroom during the day with bladder or menstrual problems
- frequent urinary, menstrual or stomach problems
- prolonged or repeated absences from school, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

All staff are made aware of the indicators of forced marriage and all concerns are reported immediately to the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

Good Practice Guidelines, Staff Behaviour Policy/Code of Conduct and Staff Handbook

To meet and maintain our responsibilities towards students we need to agree standards of good practice which form a code of conduct for all staff.

Pathway CTM's good practice includes:

- treating all students with respect
- setting a good example by conducting ourselves professionally and appropriately
- taking responsibility for our own actions and behaviours and avoiding any conduct which would lead any reasonable person to question our motivation and intentions
- encouraging positive, respectful and safe behaviour among students
- being a good listener
- being alert to changes in students' behaviour and to signs of abuse and neglect
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the safeguarding suite of policies and guidance documents on wider
- safeguarding issues, for example bullying, behaviour, physical contact and information-sharing
- maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language
- being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse
- referring all concerns about a student's safety and welfare to the DSL, or, if necessarily make a direct referral to police or local authority
- adhere to the company policies with regard to the use of personal mobile devices, communication with students, use of social media and online networking
- acknowledge our responsibility to inform the CEO of any change in our personal circumstances which may affect our ability to work with students as soon as reasonably practicable
- work in an open and transparent way
- work with other colleagues where possible, avoiding any situations which may leave it open to question
- discuss and/or take advice from the DSL over any incident which may give rise to concern
- immediately record any incidents, concerns, actions and decisions made

- apply the same professional standards regardless of sex, race, disability, religion or belief or sexual orientation, have equal rights to protection
- be aware of the Confidentiality Policy
- be aware that breaches of the law and other professional guidelines could result in criminal and/or disciplinary action being taken

Research and serious case reviews have repeatedly shown dangers of failing to take effective action.

Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect
- poor record keeping
- failing to listen to the views of the student
- failing to re-assess concerns when situations do not improve
- not sharing information
- sharing information too slowly
- a lack of challenge to those who appear not to be taking action.

Honour-based Abuse (HBA)

HBA encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage (FM), and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and will be handled and escalated as such.

All staff are made aware of the indicators of HBA and all concerns are reported immediately to the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

Impact of Abuse

The impact of student abuse should not be underestimated. Many students do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some student's full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. It is important to recognise that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

Where students have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACE's), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken, following the child protection procedures above and speaking to the DSL.

Looked After and Previously Looked After Children

A student who has been in the care of their local authority for more than 24 hours is known as a looked after child or may be referred to as children in care. Looked after children are those living with foster parents, living in a residential children's home or living in residential settings like schools or secure units. The most common reason for children becoming looked after is as a result of abuse and/or neglect.

A previously looked after student potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe.

Online Safety

We understand students increasingly use mobile phones, tablets and computers on a daily basis. They are a source of fun, entertainment, communication and education. However, we know that some adults and young people will use these technologies to harm students. The harm might range from sending hurtful or abusive texts and emails, to enticing students to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The company's Online Safety Policy has regard to the [Teaching Online Safety guidance](#) and explains how we try to keep students safe. Cyberbullying and sexting by students, via text, emails or other media platforms, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures and by following the [UKCCIS guidance](#).

Education at home: where students are being asked to learn online at home we follow the DfE advice [safeguarding-in-schools-colleges- and-other-providers](#) and [safeguarding-and-remote-education](#).

All staff receive online safety awareness from induction and advice regarding the use of social networking and electronic communication with students.

If staff know of misuse of social sites, either by a staff member or student, the issue should be reported to the DSL without delay.

Partnerships with Others

We recognise that it is essential to establish positive and effective working relationships with safeguarding partners and other agencies. There is a joint responsibility under Working together to safeguard children, on all agencies to share information to ensure the safeguarding of all children.

Peer on Peer/Child on Child Abuse

Staff are aware that children can abuse children. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, otherwise causing physical harm
- sexual violence, such as rape, assault by penetration and sexual assault
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- upskirting*, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals

* *The Voyeurism Offences Act, which was commonly known as the Upskirting Bill, came into force on 12 April 2019.*

We believe peer on peer abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence.

We recognise that students who are abused or neglected may find it difficult to develop a sense of self-worth and to view the world in a positive way. We recognise that some students who have experienced abuse may harm others.

We will always take a considered and sensitive approach in order that we can support all of our students. We will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide. Allowing students to express their views and give feedback and always operating with the best interests of the student at their heart.

Any form of abuse or harmful behaviour will immediately be reported to the DSL and discussed with the student's school.

Photography and Images

We will not allow images of students to be used on websites, publicity, or press releases, without express permission, and if we do obtain such permission, we will not identify individual student by name.

Preventing Radicalisation

Protecting students from the risk of radicalisation is seen as part of our wider safeguarding duties and is similar in nature to protecting students from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology.

It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with other safeguarding risks, staff are alert to changes in students behaviour which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying student's who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

From 1 July 2015 there is a duty under section 26 of the Counter-Terrorism and Security Act 2015 ("the CTSA 2015"), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

All staff are made aware of the indicators of radicalisation and all concerns are reported immediately to the DSL who will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care.

Private Fostering

Private fostering occurs when a student under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A student is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of staff through the normal course of their interaction, and promotion of learning activities, with students.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the student has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, student sexual exploitation or modern-day slavery.

We understand our mandatory duty to report to the local authority where we are aware or suspect that a student is subject to a private fostering arrangement. We follow the [Children Act 1989 Private fostering](#) for comprehensive guidance on private fostering.

Racist and Homophobic Incidents

Pathway CTM values the individuality of all our students. We are committed to giving all our students every opportunity to achieve the highest standards. Within this ethos of achievement, we do not tolerate bullying or harassment of any kind. We have regard to the Department for Education specific [guidance on bullying including homophobic and transphobic bullying and bullying related to sexual orientation, transgender, disability, race and religion](#). We follow the local authority's guidance on reporting and recording all racist and homophobic incidents.

Reporting Directly to Child Protection Agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the DSL, CEO are all unavailable
- they are convinced that a direct report is the only way to ensure the student's safety
- for any other reason they make a judgement that direct referral is in the best interests of the student

Safer Recruitment

Pathway CTM endeavours to ensure that we do our utmost to employ 'safe' staff by following our Recruitment and Selection Policy which has been written in accordance with the guidance in [Part 3, Keeping children safe in education September 2020](#).

- Providing the following safeguarding statement in recruitment adverts or application details – 'recruitment is done in line with safe recruitment practices.'
- Job or role descriptions for all roles involving contact with children and / or adults at risk will contain reference to safeguarding responsibilities.
- Shortlisting is based on formal application processes/forms and not on provision of CVs
- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification
- DBS checks will be conducted for specific roles for all staff (paid or unpaid) working with children and adults at risk. Portable/ carry over DBS checks from another employer will not be deemed to be sufficient. It is a criminal offence for individuals barred by the DBS to work or apply to work with children or adults at risk in a wide range of posts.

Disclosure and Barring Service Gap Management

The organisation commits resources to providing Disclosure and barring service checks on staff (paid or unpaid) whose roles involve contact with children young people and adults at risk.

In order to avoid DBS gaps, the organisation will maintain and review a list of roles across the organisation which involve contact with children, young people and adults at risk.

In addition to checks on recruitment for roles involving contact with children/ vulnerable adults, for existing staff (paid or unpaid) who transfer from a role which does not require a DBS check to one which involves contact with children / vulnerable adults will be subject to a DBS check.

Managing Allegations of Abuse

Pathway CTM have procedures for managing concerns/allegations, against staff or other adults, that might pose a risk of harm to children. As set out in [Part four, Keeping children safe in education 2020](#) procedures are in place to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have, had they not resigned.

Service delivery contracting and sub-contracting

- Safeguarding will be a fixed agenda item on any partnership reporting meetings
- Contracts and memorandums of agreement for partnership delivery work will include clear minimum requirements, arrangements for safeguarding and non-compliance procedures'

Serious violence

All staff are made aware of indicators, which may signal that students are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs. Staff will notify the DSL immediately if they are concerned about any student.

Further information can be found in [Preventing youth violence and gang involvement](#).

Sexting

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves, or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops or any device that allows the sharing of media and messages.

All incidents must be reported to the DSL, as soon as practically possible who will follow the guidance [Advice for Schools and Colleges on Responding to Sexting Incidents](#) and [Searching Screening and Confiscation Advice](#) for schools. The key consideration is for staff not to view or forward illegal images of a student.

Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two students of any age and sex. It can also occur through a group of students sexually assaulting or sexually harassing a single student or group of students.

Students who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

We understand that reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. We follow departmental advice [Sexual Violence and Sexual Harassment between Children in Schools and Colleges](#) and the summary in Part 5 of Keeping Children safe in Education (2020).

Statutory Assessments

Where a student is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

Children in need (section 17)

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a student who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm (section 47)

Local authorities, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a student is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the student's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

Support for those Involved in a Student Protection Issue

Child abuse is devastating for the student and can also result in distress and anxiety for staff who become involved. We will support students and staff by:

- taking all suspicions and disclosures seriously
- where a member of staff is the subject of an allegation made by a student, a separate link person will be nominated to avoid any conflict of interest
- responding sympathetically to any request from students or staff for time out to deal with distress or anxiety
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- storing records securely
- offering details of helplines, counselling or other avenues of external support
- following the procedures laid down in our whistleblowing, complaints and disciplinary procedures
- cooperating fully with relevant statutory agencies.

Staff Training

All new members of staff (including volunteers) will receive an induction and safeguarding and child protection awareness training, including online safety, which will give an overview of the organisation, ensure they know its purpose, values, services, structure and to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

All staff and volunteers will be expected to attend safeguarding updates regularly, at least annually, in order to provide them with relevant skills and knowledge to safeguard children effectively.

New staff and volunteers will receive an explanation during their induction which includes the company's safeguarding policies, reporting and recording arrangements, the staff handbook, details for the DSL and at least Part one, Part five and Annex A of Keeping children safe in education 2020 and What to do if you're worried a student is being abused.

The DSL will receive training updated at least every two years. In addition to formal training their knowledge and skills will be updated at regular intervals, but at least annually, to keep up with any developments relevant to their role.

There will be a recruitment panel responsible for the safe recruitment of all those working directly with students. They will always be at least one member of each recruitment panel will have attended safer recruitment training.

To ensure compliance under Section 5B of the 2003 Act. All staff will undertake FGM training to make them aware of the indicators and their responsibilities around the mandatory reporting FGM.

To ensure compliance under section 26 of the Counter-Terrorism and Security Act 2015 at least the DSL and the undertake Prevent training in order to exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism".

Volunteers

We understand that some people, otherwise unsuitable for working with children, may use volunteering to gain access to children. For this reason, any volunteers, in whatever capacity, will be given the same recruitment consideration as paid staff, including a risk assessment as indicated in Keeping Children Safe in Education (2020).

Whistleblowing

We understand that employees are often the first to realise that there may be something seriously wrong within the company. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues or company. They may also fear harassment or victimisation. In these circumstances it may be easier to ignore the concern rather than report what may just be a suspicion of malpractice.

We are committed to the highest possible standards of openness, probity and accountability. In line with that commitment and to reflect the principles in Sir Robert Francis' Freedom to Speak Up Review, we expect employees, and others who work on behalf of the company, who have serious concerns about any aspect of our work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis, more details and organisations which may be contacted can be found in our Whistleblowing Policy and at the end of this policy.

NSPCC Student Protection Helpline

The NSPCC Student Protection Helpline is a free 24-hour service that provides counselling, information and advice to anyone concerned about a student at risk of abuse.

Telephone: 0808 800 5000 - Email: help@nspcc.org.uk

NSPCC Whistleblowing Advice Line

The NSPCC has launched a government funded Whistleblowing Advice Line. This will take calls from professionals from any sector who are worried about the way their, or another, organisation is dealing with student protection issues. Employees who don't feel able to escalate these issues internally can contact the service, as well as those who have been unsuccessful in doing so.

- general guidance on whistleblowing can be found via: [Advice on Whistleblowing](#)
- the NSPCC's [what you can do to report abuse](#) dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding student protection failures internally or have concerns about the way a concern is being handled by their company.
 - call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday
 - email: help@nspcc.org.uk



Chris McNamara (Jan 20, 2021 21:14 GMT)

Chris McNamara
CEO

Appendix 1

Designated Safeguarding Lead Role Description

In accordance with Keeping Children safe in education September 2020, we have appointed a senior member of staff «DSL» as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection (including online safety). In addition, we have Deputy Designated Safeguarding Leads (DDSL's) «DSLs» who have been trained to the same standard and as such safeguarding activities are delegated to them. However, the ultimate lead responsibility for student protection remains with «DSL».

Designated Safeguarding Lead main role

The DSL is expected to:

- Take **lead responsibility** for safeguarding and student protection (including online safety)
- Activities can be delegated to deputy designated safeguarding leads, but the ultimate lead responsibility remains with the designated safeguarding lead and must not be delegated.
- Have the appropriate status and authority within the company to carry out the duties of the post.
- Given the time, funding, training, resources and support to provide advice and support to other staff on student welfare and student protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Deputy Designated Safeguarding Leads

All deputies are trained to the same standard as the designated safeguarding leads.

The designated safeguarding lead is expected to:

Manage Referrals

- refer cases of suspected abuse to the school, local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or left due to risk/harm to a student to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with Others

- act as a point of contact with the three safeguarding partners;
- liaise with the CEO to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for student protection concerns in cases which concern a staff member;
- act as a source of support, advice and expertise for all staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including
- local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a student protection case conference

- and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the safeguarding and child protection policy and procedures, especially new and part time staff.
- are alert to the specific needs of children in need, those with special educational needs and young carers.
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation.
- understand the importance of information sharing, both within the company and with the three safeguarding partners, other agencies, organisations and practitioners.
- are able to keep detailed, accurate, secure written records of concerns and referrals.
- understand and support with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online.
- can recognise the additional risks that students with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND students to stay safe online.
- obtain access to resources and attend any relevant or refresher training courses.
- encourage a culture of listening to students and taking account of their wishes and feelings.

Raise Awareness

- ensure the safeguarding and child protection policies are known, understood, and used appropriately.
- ensure the safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly.
- ensure the safeguarding and child protection policy is available publicly.
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with staff.

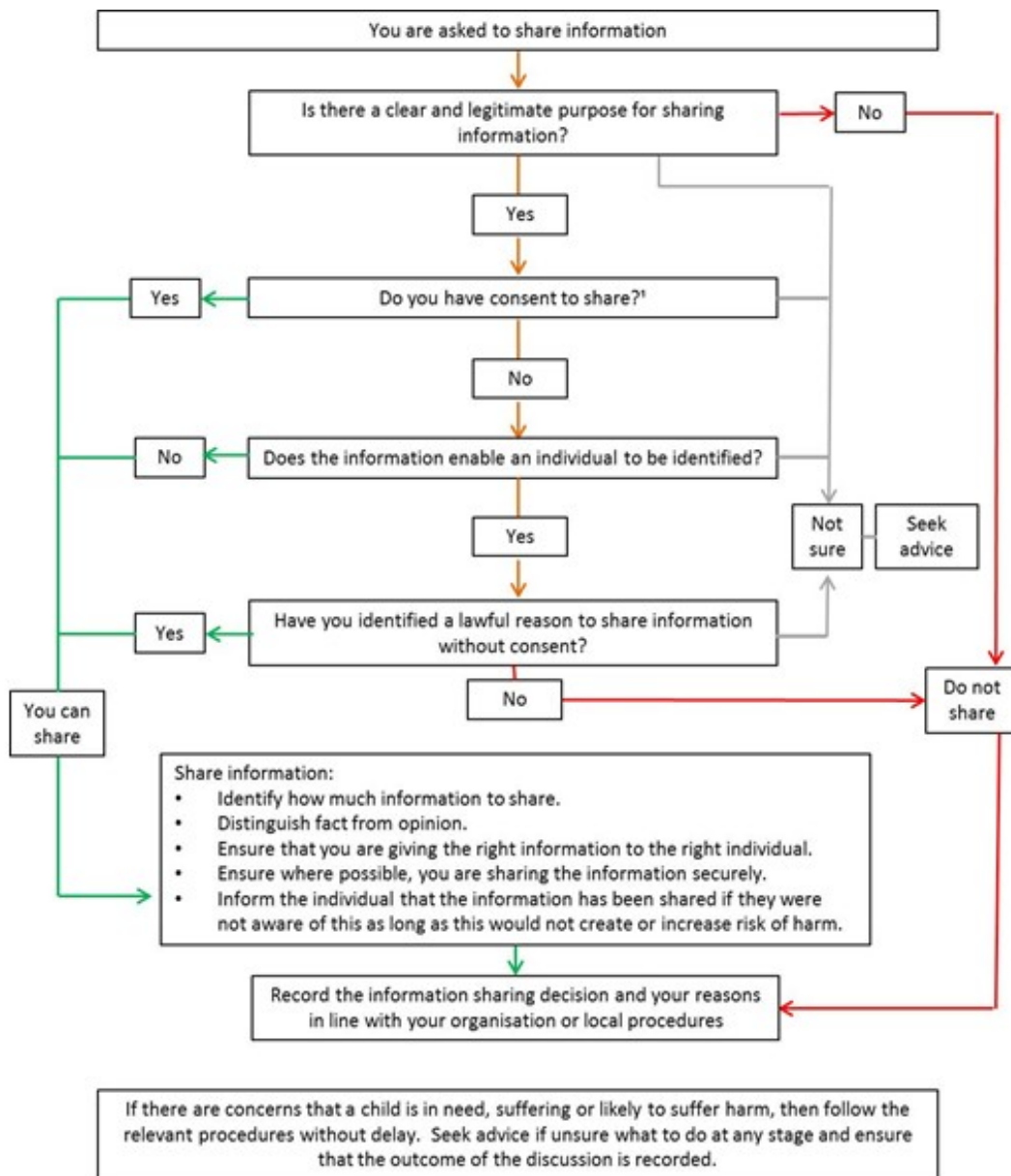
Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school hours) for staff to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person.

Appendix 2

Flowchart of when and how to share information

Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)



1. Consent must be unambiguous, freely given and may be withdrawn at any time

Appendix 3

Actions where there are concerns about a child



¹ In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.
² Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.
³ Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).
⁴ Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).
⁵ This could include applying for an Emergency Protection Order (EPO).

DOCUMENT CONTROL	
Doc Ref:	December 2020
Document Full Title	Safeguarding and Child Protection Policy
Document Version number	V.2
Document stored in	Safeguarding Support Limited
Owned by:	Pathway CTM
Authorised by:	Chris McNamara
Date:	December 2020
Review Date:	December 2021
Circulation:	All Staff and Volunteers Website Clients