



Pathway Group

Safeguarding Policy

Published: 29th July 2021



Introduction

Pathway Group is committed to safeguarding and promoting the welfare, both physical and emotional, of every Learner (young people, adult, vulnerable adult) who participates in activities either directly organised by Pathway Group or through a third party working collaboratively with us.

This Policy sets out a clear and consistent framework for paid and unpaid staff and third parties working on behalf of Pathway Group to deliver this commitment, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Promoting and prioritising the safety and wellbeing of every Learner with all Pathway Group team members and those third party organisations who work directly on our behalf with Learners.
- Adopting safe recruitment procedures for paid and non-paid team members that help deter, reject or identify people who might pose a risk or inappropriate influence to Learners at risk.
- Ensuring that all existing and new team members understand their roles and responsibilities under safeguarding legislation and statutory guidance, to be alert to signs of abuse or maltreatment and refer concerns to the appropriate person using the agreed procedures.
- Ensuring that the organisations that work on our behalf ensure that through their operations, policies and procedures, they commit to protecting all Learners from harm.
- Ensuring all Learners (young people, adults), parents and carers are informed of the policy and procedures as fully as possible by making it available during engagement activities.
- Ensuring the Safeguarding Policy and its application is overseen through corporate governance arrangements including the Board of Directors and the Pathway Group Audit Committee.

The designated lead for safeguarding within Pathway Group will take all concerns and allegations of abuse seriously whether against Pathway Group staff and volunteers, or our contractors and third party deliverers.

Parents, carers, Learners (young people, adults at risk and any other adults) associated with Pathway group through our work either directly or indirectly will have access to our policies and procedures to ensure any safeguarding concern can be referred to the relevant authorities.



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The designated lead for safeguarding will escalate these by referring to the Local Authority Multi-Agency Safeguarding Team and the relevant independent Local Authority Designated Officer for social care for children, young people, vulnerable adults. In emergencies, this obligation may extend to contacting the Police.

The safeguarding policy and supporting procedures will be widely promoted and mandatory for all team members within Pathway Group. Failure to comply with the safeguarding policy and procedures will be addressed without delay and dismissal/exclusion from the organisation may be the result.

Safaraz Ali
Chief Executive Officer / Managing Director





1. Purpose

The purpose of this policy is to:

- ensure all Learners (young people, adults, vulnerable adults) engaged within provision delivered through Pathway Group, including those on apprenticeship provision or on work-placements, are adequately supported and protected from harm and the risk of exploitation, including Child Sexual Exploitation (CSE) and radicalisation
- ensure that all staff, volunteers, sub-contractors, partners and employers carry out their duty of care in regard to these individuals
- ensure that all vetting (DBS) checks are carried out on staff, volunteers, sub-contractor staff and employers in line with legislative requirements
- ensure procedures are carried out in line with Local Authority Safeguarding requirements, regulations and guidelines.

2. Scope

This policy statement covers all staff, sub-contractors, volunteers, employers, partners and Learners of the Service. It also includes visitors, contractors and suppliers.

3. Policy Statement

Pathway Group is committed to preventing abuse and exploitation wherever possible and ensuring that robust procedures are in place for dealing with incidents of abuse and exploitation. This expectation is extended to cover all partnerships and any sub-contracting or Service Level Agreements that are in place

This will be achieved through:

- identifying a 'Designated Safeguarding Lead for the Service and Deputy Designated Persons in the geographical areas
- adopting a 'whole organisation' approach to safeguarding, including Prevent Duty, Information Governance, GDPR and online learning
- ensuring awareness of Safeguarding and Prevent throughout the Service and within all provision, across all levels of staff; volunteers, subcontractors and employers
- ensuring all sub-contractors and employers who have an apprentice, (particularly 16-18 Learners or Adults with Learning Difficulties and Disabilities), intern, or trainee working or attending work-placement on their premises, understand and are compliant with Safeguarding Guidance on Disclosure and Barring Service (DBS)
- ensuring Learners' safety in all aspects, including e-safety, is paramount and that Learners feel safe
- ensuring all staff and volunteers receive relevant Safeguarding and Prevent training appropriate to their role
- ensuring all staff receive DBS checks as appropriate and recruitment procedures support staff identification, qualification and criminal checking



- ensuring vetting and barring procedures are carried out in line with legislative requirements
- adopting clear lines of communication with staff, Learners, sub-contractors partners and employers, keeping them up to date on legislation and procedures, including keeping them within the law and supporting them to act in non-extremist ways
- ensuring effective links are kept with outside agencies and partners to promote Safeguarding and Prevent duty
- ensuring all appropriate risk assessments are carried out effectively, in a timely manner and kept live. Risk assessments relate to learning environments including work placements and employer's premises and staff. No work placement will commence until all appropriate checks and risk assessments are completed and deemed safe.
- ensuring all learning, teaching and assessment practice and resources, including online learning and resources, support the concept of the 'safe Learner'
- ensuring a clear and timely reporting procedure.

4. Safeguarding vulnerable individuals definition

- Safeguarding and promoting the welfare of vulnerable individuals is defined as:
 - Protecting vulnerable individuals from maltreatment;
 - Preventing impairment of health or development in vulnerable individuals
 - Ensuring that all vulnerable individuals are growing up in circumstances consistent with the provision of safe and effective care; and
 - Taking action to enable all vulnerable individuals to have the best outcomes.
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- Pathway Group is committed to safeguarding and promoting the welfare of all its Learners. We believe that:
 - All Learners (young people, adults and vulnerable adults) have the right to be protected from harm, abuse and neglect;
 - That every person has the right to an education and need to be safe and to feel safe within our provisions
 - Every Learner should be given support that matches their individual needs, including those who may have experienced abuse;
 - Everybody has the right to express their views, feelings and wishes and voice their own values and beliefs;
 - Everybody should be encouraged to respect each other's values and support each other;
 - All Learners have the right to be supported to meet their emotional and social needs as well as their educational needs – a happy, healthy, sociable person will achieve better educationally;



- Pathway Group must contribute to the prevention of abuse, victimisation, bullying (including homophobic, bi-phobic, trans-phobic and cyber-bullying), exploitation, extreme behaviours, discriminatory views and risk taking behaviours; and
- All staff and visitors have an important role to play in safeguarding Learners and protecting them from abuse.

4.4 Regulations and Guidelines

Pathway Group will fulfil their local and national responsibilities as laid out in the following documents:

- The most recent version of [Working Together to Safeguard Children](#) 2018 (DfE)
- The most recent version of [Keeping Children Safe in Education](#): Statutory guidance for schools and colleges (DfE Sept 2018)
- [Birmingham Adult Safeguarding Board & Procedures](#)
- [The Education Act 2002](#) s175
- [Mental Health and Behaviour in Schools](#)
- [Sexting in Schools & Colleges – responding to incidents and safeguarding young people](#) (UKCCIS) 2016
- [General Data Protection Regulation \(GDPR\)](#)
- [Data Protection Legislation \(2018\)](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Children Act 2004](#)
- [Education Act 2011](#)
- [Human Rights Act 1998](#)
- [Offender Rehabilitation Act 2014](#)

5. Overall Aims

5.1 This policy will contribute to the protection and safeguarding of our Learners and promote their welfare by:

- Clarifying standards of behaviour for staff, Partners, Learners and employers
- Contributing to the establishment of a safe, resilient and robust ethos in the learning environment, built on mutual respect and shared values;
- Encouraging Learners and partners to participate;
- Alerting staff to the signs and indicators that may be cause for concern [Recognising Abuse](#)
- Developing staff awareness of the causes of abuse;
- Developing staff awareness of the risks and vulnerabilities Learners face;
- Addressing concerns at the earliest possible stage; and



- Reducing the potential risks young people and vulnerable adults face of being exposed to violence, extremism, exploitation, discrimination or victimisation.

5.2 This Policy will contribute to supporting our Learners by:

- Raising awareness of Safeguarding
- Identifying and protecting vulnerable individuals;
- Identifying individual needs as early as possible; and
- Designing plans to address those needs.
- Implementing policies and procedures including Whistle-blowing, Bullying & Harassment, Equality & Diversity (see separate policies)

5.3 This policy will contribute to the protection of our Learners by:

- Implementing Child and Adult Protection Policies and Procedures; and
- Working in partnership with Learners and other agencies.

5.4 This policy extends to any establishment our organisation commissions to deliver education to our Learners on our behalf.

- The Board of Directors will ensure that any commissioned agency will reflect the values, philosophy and standards of Pathway Group.
- Appropriate Risk Assessments will be completed, and ongoing monitoring undertaken relating to employers providing work placements, their staff and work-related tasks, Learners ability to understand risks and their ability to work safely to mitigate acceptable risks within work-based environments.

6. Guiding Principles

6.1 Pathway Group will ensure that we follow the 7 Guiding Principles set out by the Local Authority and Safeguarding Children Board outlined in the Right Help, Right Time Guidance.

- [Right Help, Right Time](#)

6.2 In addition Pathway Group has identified the following key safeguarding messages:

- Every Learner is entitled to a rich and rounded curriculum.
- Governance is corporate, and decisions are collective, but individual Board members can and should take the lead on specific aspects such as safeguarding.
- When issues arise, Staff / DSL should speak out, addressing them internally where possible and escalating when this is unsuccessful.



7 Key Processes

7.1 All staff must be aware of the guidance issued by Local Authority Safeguarding Children Boards for example Birmingham guidance includes [Right Help Right Time](#), and procedures for [Early Help](#).

8 Expectations

8.1 All staff and Partners will:

- Be familiar with this Safeguarding Policy;
- Understand their role in relation to safeguarding;
- Be subject to Safer Recruitment processes and checks, whether they are new staff, temporary staff, contractors, volunteers etc.;
- All staff dealing with Learners must be subjected to an enhanced DBS check
- Be involved, where appropriate, in the implementation of Individual Learner Programmes, Early Help Assessments and Support Plans and inter-agency Child Protection and Vulnerable Adults Protection Plans;
- Be alert to signs and indicators of possible abuse (See Appendix 1 for current definitions and indicators);
- Record concerns and give the record to the DSL, or deputy DSL, and
- Deal with a disclosure of abuse from a Learner in line with the Guidance in Appendix 2 - you must inform the DSL immediately, and provide a written account as soon as possible.

8.2 All staff will receive annual Safeguarding Training and update briefings as appropriate. Key staff will undertake more specialist Safeguarding Training as agreed by the Board of Directors.

9. The Designated Safeguarding Lead (DSL)

9.1 Our DSL on the Senior Leadership Team is **Sajad Ali**. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and Learner protection remains with the DSL. This responsibility should not be delegated.

The deputy DSLs will support the DSL within the role. They are:

- **Martin Chandler**
- In addition to the named DSO and Deputy and to ensure the policy remains current, accurate and relevant so far as reasonably practical that each Pathway Group SkillsZone have nominated safeguarding officers, whom are not named within this policy, however are identified at centre and organisational chart levels.



- 9.2 Board of Directors should ensure an appropriate senior member of staff, from the organisation's Leadership Team is appointed to the role of DSL. This should be explicit in the role-holder's job description.
- 9.3 Any steps taken to support a Learner who has a safeguarding vulnerability must be reported to the lead DSL in the organisation; the DSL will advise as appropriate.
- 9.4 Safeguarding and Learner Protection information will be dealt with, in a confidential manner. Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to support an individual. A written record will be made of what information has been shared, with whom, and when.
- 9.5 Safeguarding records will be stored securely in a central place separate from Academic Records. Individual files will be kept for each concern. Files will be kept for at least the period during which the Learner is engaged with Pathway Group, and beyond that in line with current data legislation and guidance.
- 9.6 Access to records by staff other than by the DSL will be restricted, and a record will be kept of who has had access to them, when and why they accessed them.
- 9.7 **Do not disclose to a parent, family member or friends any information held on a Learner if this would put them at risk of significant harm.**
- 9.8 The Designated Safeguarding Lead should also consider if it would be appropriate to share any information with new service providers / placements or colleges in advance of a Learner leaving. For example, information that would allow the new provider to continue supporting victims of abuse and have that support in place for when they start.
- 9.9 Where a vulnerable Learner is moving to a Further Education establishment, consideration should be given to their wishes and feelings regarding their protection information being passed on in order that the FE establishment can provide appropriate support.
- 9.10 Our DSL and any deputies must undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years.
 - 9.10.1 In addition to their formal training as set out above, their knowledge and skills should be updated, (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.



9.11 When a DSL resigns their post or no longer has responsibility, there should be a full face to face handover/exchange of information with the new post holder.

9.11.1 In exceptional circumstances, when a face to face handover is unfeasible, the deputy will ensure that the new post holder is fully conversant with all procedures and case files.

10. The Directors

10.1 The Board of Directors are the accountable body and must ensure that they comply with their duties under legislation.

10.2 The board will ensure that:

There are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote Learner's welfare;

- The organisation operates "Safer Recruitment" procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers;
- At least one senior member of the Leadership Team acts as a DSL, and at least a further deputy DSL is appointed;
- That appropriate time is made available to the DSL and deputy DSL(s) to allow them to undertake their duties; their role should be explicit in their Job Description;
- All other staff who work with Learners undertake Safeguarding Training on an annual basis with additional updates as necessary and a training record maintained;
- Temporary staff and volunteers are made aware of the organisations' arrangements for safeguarding & Learner protection and their responsibilities;
- The organisation has procedures for dealing with allegations of abuse against staff/volunteers.

10.3 All policies/procedures that relate to safeguarding and Learner protection are reviewed annually.

10.4 The Director for safeguarding at the Company is Safaraz Ali. The Director is responsible for liaising with the DSL over all matters regarding safeguarding and Learner protection issues. The role is strategic rather than operational – they will not be involved in concerns about individual Learners.



- 10.5 The Director will receive safeguarding training relevant to the governance role and this will be updated every 2 years.
- 10.6 The Nominated Director will liaise with the DSL to produce a report at least annually for governors.
- 10.7 Pathway Group have a written policy and procedure for dealing with allegations of abuse against members of staff, visitors, volunteers or governors that complies with all BSCB procedures.

11. A Safer Culture

11.1 Safer Recruitment and Selection

11.1.1 Pathway Group pays full regard to 'Keeping Children Safe in Education (Sept 18). Safer Recruitment practice includes scrutinising applicants, verifying identity including Right to Work in the UK and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS checks), barred list checks and prohibition checks. Evidence of these checks must be recorded on our Single Central Register.

11.1.2 All recruitment materials will include reference to the company's commitment to safeguarding and promoting the wellbeing of Learners.

11.1.3 The Human Resource Director and all Department Heads have undertaken appropriate training in Safer Recruitment. One of the above will be involved in all staff / volunteer recruitment processes and sit on the Recruitment Panel. A member of the Board of Directors should have received Safer Recruitment training.

12 Induction – Staff and Learners

- 12.1 All staff must be aware of systems within Pathway Group which support safeguarding and these should be explained to them as part of staff Induction. This should include:
 - This Safeguarding Policy;
 - The Behaviour Policy;
 - The Staff Handbook (Code of Conduct)
 - The role of the DSL (including the identity of the DSL and any deputies).



12.2 Copies of policies / procedures should be provided to staff at Induction and can be found on Pathway Direct for all staff to access at any point.

12.3 Staff Support

12.3.1 We recognise the stressful nature of safeguarding and child protection work. We will support staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

12.3.2 Regular supervision will be offered to the DSL within Pathway Group and may be extended to other members of staff as deemed appropriate by the organisation.

12.4 Learner Induction and Training

12.4.1 When joining Pathway Group, each learner undergoes an Induction where all policies and procedures are outlined including this Safeguarding Policy, our Health & Safety Policy and our Complaints Procedure. Understanding is checked using scenario testing and question/answer sessions. Our Learner Welcome Pack lists policies and procedures and provides names of responsible persons within Pathway Groups to whom an issue can be raised with.

13 The Use of Reasonable Force

13.1 There are exceptional circumstances when it is appropriate for staff in the Company to use reasonable force to safeguard Learners. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain Learners. This can range from guiding a Learner to safety by the arm, to more extreme circumstances such as breaking up a fight or where a Learner needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between Learners or blocking a Learner's path, or active physical contact such as leading a Learner by the arm out of the classroom.

13.2 Our organisation will not have a 'no contact' policy as this could lead our staff unable to fully support and protect their Learners.

13.3 When using reasonable force in response to risks presented by incidents involving Learners including any with SEN or disabilities, or with medical conditions, staff should consider the risks carefully.



13.4 They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty.

13.5 Our organisation will promote positive and proactive behaviour support, for instance through drawing up Individual Behaviour Plans for more vulnerable children, and agreeing them with parents and carers, will reduce the occurrence of challenging behaviour and the need to use reasonable force.

14. Our Role in the Prevention Of Abuse

14.1 We will provide opportunities for all Learners to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.

15.2 Safeguarding knowledge will be embedded in educational delivery, for example self-esteem, emotional literacy, assertiveness, power, healthy relationship education, online safety, sexting and bullying (including cyber bullying).

15.3 Relevant issues will be addressed through all areas of the Learners journey.

15.4 All our policies which address issues of power and potential harm, for example Anti-Bullying, Discrimination, Equal Opportunities, will be inter-linked to ensure a whole organisational approach.

15.5 Our Safeguarding Policy cannot be separated from the general ethos of the business, which should ensure that Learners are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

16 What We Will Do When We Are Concerned- Early Help Response

16.1 Where unmet needs have been identified for a Learner utilising the Right Help Right Time (RHRT) model but there is no evidence of a significant risk, the DSL will add the person to our records of Learners with a safeguarding vulnerability, and support staff to deliver an appropriate Early Help response.

16.2 Should the professional opinion of the DSL indicate that a multi-agency Early Help response is required in order to meet the unmet safeguarding need, the DSL will generally lead on liaising with other agencies and setting up an Early Help Assessment register these documents with the Early Help Support Team. This multi-agency plan will then be reviewed regularly and progress updated towards the goals until the unmet safeguarding needs have been addressed.



- 16.3 Should the DSL feel that a Social Care response is needed to meet the unmet safeguarding need; the DSL will initiate a Request for Support, seeking advice from Children’s Advice and Support Service (CASS) as required.
- 16.4 The DSL will then oversee the agreed intervention from Pathway Group as part of the multiagency safeguarding response and support.
- 17. PREVENT - Safeguarding Learners Who Are Vulnerable to Radicalisation**
- 17.1 Since 2010, when the Government published the first version of the Prevent Strategy, there has been an awareness of the specific need to safeguard Learners (including children, young people & vulnerable adults) from extremist ideologies. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children, young people and vulnerable adults to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- 17.2 Pathway Group values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society’s values. Learners and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- 17.3 The current threat of terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children, young people and vulnerable adults, vulnerable to future manipulation and exploitation. Pathway Group is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting Learners from the risk of radicalisation is part of the company’s safeguarding duty.
- 17.4 Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are found in the link: [Definitions and Indicators](#)
- 17.5 Pathway Group seeks to protect Learners against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo-Nazi/White Supremacist ideology, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.



18. PREVENT - Risk Reduction

18.1 The Senior Leadership Team and the DSL will assess the level of risk within the organisation and put actions in place to reduce that risk. Risk assessment may include consideration of the company premises by external agencies, Anti-Bullying Policy and other issues specific to the company's profile, community and philosophy.

18.2 PREVENT - Response

18.2.1 With effect from 1st July 2015, all education settings are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty.

18.2.2 There is no single way to identify an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability and these are often combined with specific needs for which an extremist group may appear to provide answers, and specific influences such as family, friends and online contacts. The use of social media has become a significant feature in the radicalisation of young people.

18.2.3 Our organisation has identified a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: The SPOC for our organisation is Sajad Ali.

18.2.4 Staff within our organisation will be alert to changes in a Learner's behaviour or attitude which could indicate that they are in need of help or protection.

18.2.5 Our organisation will monitor online activity within the company to ensure that inappropriate sites are not accessed by Learners or staff.

18.2.6 When any member of staff has concerns that a Learner may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the DSL if this is not the same person.

18.2.7 Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.



18.3 Channel

18.3.1 Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

18.3.2 The Channel Programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.

18.3.3 Further guidance about duties relating to the risk of radicalisation is available in the Advice on [The Prevent Duty](#).

18.4 Safeguarding Learners Who Are Vulnerable to Exploitation, Forced Marriage, Female Genital Mutilation or Trafficking

18.4.1 Our Safeguarding Policy and the organisation's values, provide the basic platform to ensure Learners are given the support to respect themselves and others, stand up for themselves and protect each other.

18.4.2 Our company keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation.

18.4.3 Our staff are supported through regular training to recognise warning signs and symptoms in relation to specific issues, and include such issues, in an age appropriate way, in their lesson plans and reviews.

18.4.4 Our DSL(s) know where to seek and get advice as necessary and materials to support the work we do.

18.5 Reporting of Female Genital Mutilation (FGM)

18.5.1 All education settings are subject to a mandatory reporting requirement in respect of female genital mutilation. When a staff member discovers that an act of FGM



appears to have been carried out, that staff member has a statutory duty to report it to the Police.

- 18.5.2 Failure to report such cases will result in disciplinary sanctions. They will also discuss the situation with the DSL who will consult Birmingham Children's Trust before a decision is made as to whether the mandatory reporting duty applies.

19 Children, Young People or Vulnerable Adults Who Go Missing

- 19.1 A child, young person or vulnerable adult going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of them going missing in future.
- 19.2 Our organisation will hold emergency contact numbers for each Learner. It is good practice to give our company additional options to make contact with a responsible person when a Learner is absent, is also identified as a welfare and/or safeguarding concern.
- 19.4 Our company will demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of a Learner that would be considered 'missing'.

20. Sexual Violence and Sexual Harassment Between Learners

- 20.1 It is important that all staff are aware of sexual violence and the fact children, young people and adults can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the [Sexual offences act 2003](#) as described as Rape, Assault by Penetration, Sexual Assault
- 20.2 The company will follow the correct procedure and notify the relevant external agencies should any information of this nature come to their attention.

21. Involving Parents/Carers

- 21.1 We will discuss any Safeguarding or Protection concerns with parents/carers (where appropriate) before approaching other agencies and will seek their consent to making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the DSL.



21.1.2 However there may be occasions when the DSL will contact another agency before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the Learner.

22. Multi-Agency Work

22.1 We work in partnership with other agencies to promote the best interests of our Learners as a top priority in all decisions and actions that affect them. The organisation will, where necessary, liaise with these agencies and make requests for support. These requests will be made by the DSL

22.2 When invited the DSL will participate in a MASH strategy meeting, usually by conference phone, adding data & intelligence to the discussion so that the best interests of the child / young person are met.

22.3 We will co-operate with any Protection enquiries conducted and will ensure representation at appropriate inter-agency meetings.

22.4 We will provide reports as required for these meetings. If the company representative is unable to attend, a written report will be sent and shared at least 24 hours prior to the meeting.

22.5 Where a Learner is subject to an inter-agency Child Protection Plan or a Multi-Agency Risk Assessment Conference (MARAC) Meeting, the company will contribute to the preparation, implementation and review of the Plan as appropriate.

23. Our Role in Supporting Children / Young People / Vulnerable Adults

23.1 Our staff will offer appropriate support to individual Learners who have experienced abuse, who have abused others (peer on peer abuse) or who act as Young Carers in their home situation.

23.2 A Safeguarding Action Plan will be devised, implemented and reviewed regularly for these individuals. This Plan will detail areas of support, who will be involved, and the Learner's wishes and feelings. A copy of the Plan will be kept in the individual's record.

23.3 Those who abuse others will be responded to in a way that meets their needs as well as protecting others within the organisation through a Multi-Agency Risk Assessment. Within our company we will ensure that the needs of Learners who abuse others will be considered separately from the needs of their victims.



24 Responding to An Allegation About A Member Of Staff

24.1 Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff within the organisation to abuse Learners. This procedure must be used in any case in which it is alleged that a member of staff, Board Member, visiting professional or volunteer has:

- Behaved in a way that has harmed a child / young person / vulnerable adult or may have harmed a child, young person, vulnerable adult
- Possibly committed a criminal offence against or related to a child, young person or vulnerable adult or
- Behaved in a way that indicates she/he is unsuitable to work with Learners.

The above list is not limited to and all concerns should be reported.

24.2 All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards Learners immediately.

24.2.1 Allegations or concerns about staff, colleagues and visitors must be reported directly to the DSL who will liaise with the Designated Officer (LADO) Team who will decide on any action required.

24.2.2 If the concern relates to the DSL, it must be reported immediately to the Lead Director, who will liaise with the Designated Officer Team in Birmingham Children's Trust and they will decide on any action required.

24.2.3 If the safeguarding concern relates to the proprietor of the setting then the concern must be made directly to the Children's Trust LADO team who will decide on any action required.