



Pathway Group

Safeguarding Policy

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V10.10	Amendments	Martin Chandler	Sajad Ali	Amendments	02/10/2023

Review

This policy will be regularly monitored to ensure that the objectives are achieved. In addition to the annual review cycle for this policy, this policy will also be reviewed and where necessary revised in the event of legislative or organisational changes.

Next Review Date

02/10/2024



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

Pathway Group service users, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse.

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 is always unacceptable for anyone to experience abuse, harm and neglect of any kind and Pathway Group recognises its responsibility to safeguard the welfare of our service users, particularly children and vulnerable adults, by a commitment to practice which protects them. We will carry out our responsibilities through adhering to, amongst other policies, our Safeguarding Policy, which aims to provide a caring, supportive and safe environment and values individuals for their unique talents and abilities – an environment in which all service users can learn, develop and grow to their full potential.

All members of Pathway Group are required to commit to this policy. They will be required to complete Safeguarding Training and are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

It is understandable that when a member of the members of staff is faced with a safeguarding incident it can, in that moment, feel stressful and personally challenging. It is important that any member of the members of staff who become involved in reporting and escalating safeguarding incidents feel suitably equipped and able to support our service users and act in their best interest.

This guidance has been prepared to support the members of staff to navigate their way through what can feel like a daunting and difficult process. Pathway Group has in place a network of Local Designated Safeguarding Officers (DSO's) who are on hand to provide 1-2-1 support as well as a Designated Safeguarding and Prevent Lead(s) who can provide further support.

This guidance will be shared with all members of the Pathway Group during their onboarding and all service users during their induction. A copy of the policy can be found on the Pathway Group website. It is the expectation of Pathway Group, that all staff will promote the policy to service users to ensure their understanding of Safeguarding and Prevent.



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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.



Saf Ali

Safaraz Ali
Chief Executive Officer

Review Date: 24/03/2024



Purpose

The purpose of this policy is:

- To provide a framework for protecting people from abuse, harm and neglect.
- To provide a safe environment for people to live, learn and work in safety, free from abuse, harm and neglect.
- To ensure all members staff recognise their responsibilities (through guidance, support and training), minimise risk and avoid situations where abuse or neglect might be alleged.
- To ensure all members of staff are clear that they are responsible for their own actions and behaviour and avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- To provide all members of staff with guidance on procedures to adopt in the event that they suspect a service user may be experiencing, or be at risk of, harm.

Scope

Believe that all members of staff have a collective and individual duty to provide a caring, safe and supportive environment that positively promotes the health and wellbeing of each individual service user along with their social, physical and moral development.

- Recognise that all members of staff have a responsibility to protect our service users from harm. Ensuring a consistent learner-centred approach to coaching and supporting, based on a clear understanding of service users' individual needs and views and of the Pathway Group Safeguarding Procedures.
- This policy applies to all members of staff who are responsible for interacting with service users.
- All members of staff and service users have access to this policy, the referral procedure and any supporting documentation.

Statutory Framework, Regulations & Guidance

This policy covers the legislative requirements and recommendations pertaining to the protection of children, young people and adults at risk in the UK, in accordance with statutory guidance on safeguarding and promoting the welfare of learners in education.

This policy has been created in line with:

- The Children Act 1989 provides the legal framework for the protection of people under 18 in the UK.
- The Protection of Children Act 1999
- Working Together to Safeguard Children 2018 is a document which sets out how all agencies and professionals should work together to promote the welfare of children and vulnerable adults.



- DfE Safeguarding Children and Safer Recruitment in Education 2007 places the following responsibilities on all educational organisations:
 - All members of staff should be alert to signs of abuse and know to whom they should report any concerns or suspicions.
 - A Designated Safeguarding Lead or Officer should have responsibility for coordinating action within Pathway Group and for liaising with other agencies.
 - Members of the members of staff with designated responsibility for service user protection should receive appropriate training.
 - Educational organisations should be aware of and follow the procedures established by the Local Safeguarding partnerships and, where appropriate, by the Local Educational Authority or Children’s Social Care.
 - Educational organisations should have procedures, of which all staff are aware, for handling suspected cases of abuse, including procedures to be followed if a member of staff is accused of abuse.

- Keeping Children Safe in Education 2023, setting out the legal duties you must follow to safeguard and promote the welfare of children and young people under the age of 18 in schools and colleges.

- Modern Slavery Act 2015, which is designed to combat modern slavery in the United Kingdom and consolidates previous offences relating to trafficking and slavery.

- Section 26 of the Counter-Terrorism and Security Act 2015 the Act places a duty on certain bodies, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.

- The Prevent strategy, published by the Government in 2011, is part of the overall counter-terrorism strategy, CONTEST. The aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. The Prevent strategy has three specific strategic objectives:
 - Respond to the ideological challenges of terrorism and the threat we face from those who promote it.
 - Prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support.
 - Work with sectors and institutions where there are risks of radicalisation that we need to address.

- 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



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- Prevent Policy & Action Plan
- Low Level Concerns Policy
- Domestic Abuse Act 2021
- Education and Training (Welfare of Children) Act 2021

Local Safeguarding Partnerships that bring together all services for children and vulnerable people in a local area to focus on improving outcomes for all.

Procedure



Recognise

The ability to recognise possible indicators of abuse is of fundamental importance. Whether the abuse may occur on the premises or in any other setting. All those playing a role in meeting the individuals needs should be aware and informed so that possible abuse can be recognised, investigated and acted on seamlessly and effectively.

Signs and symptoms of abuse may include direct disclosure. Other people in a position to identify concerns include assessors, coaches, facilitators, business support staff, immediate colleagues and peers. All of these persons will be trained to understand the signs of abuse and know how where and who to report concerns to.

Respond

An appropriate response is vital. No report of, or concern about, possible abuse should be ignored. To determine the most appropriate response, find out whether you are dealing with an allegation from an service user against a member of the members of staff, a fellow service user or another. Is this a disclosure from an individual alleging abuse to themselves or to another? Is the reporting of concern or suspicion? What precisely is alleged to have happened? **Clarity is vital.**

- Do not lead or probe with questions, remain calm and demonstrate interest and concern while investigating.
- Listen well. Inform the person sharing a concern with you that what they have raised must be recorded and passed on so that possible abuse can be dealt with, and this will be done on a limited “need to know” basis with as few others as possible knowing the identity of the complainant and all in the chain of reporting will respect confidentiality.
- Reassure them that they have done the right thing in reporting their concerns and that you will do everything you can to help. Do not make unrealistic promises. Ensure that testimony is recorded and reported, and that the complaint and the subject of the complaint are treated in line with Pathway Group’s safeguarding policy and procedures.



Report

Report your concerns to your Local Designated Safeguarding Officer in the first instance. Should this be inappropriate you should report directly to the Designated Safeguarding Lead responsible for dealing with all issues relating to safeguarding. If this is not possible you should report your concern to a relevant member of the Pathway Group's Senior Leadership Team. Once you have reported the cause for concern by completing safeguarding concern reporting facilities via pathwaygroup.co.uk/safeguard, responsibility resides with them.

Record

You should record precisely what has been alleged, using the words of the complainant. Your record should use accurate quotation. It should also, if felt appropriate, include factual observations about the physical and emotional state of the individual sharing their concerns with you. This information should be recorded and stored securely, in line with Pathway Group's Privacy Notice and GDPR Statement and should be accessible only to those who need to access it as part of the action taken.

Please record all safeguarding incidents and concern via:

<https://pathwaygroup.co.uk/safeguard>

Refer

It is the Designated Safeguarding Lead or their Officers who can make decisions to refer a complaint or allegation, having gathered and examined all relevant testimony and information.

- However, in exceptional circumstances where people are at immediate risk of harm OR where the DSL/DSO is acting inappropriately, anyone can make this referral. If a member staff does make the referral, then they need to ensure they still report this to the DSL.
- Only the Designated Safeguarding Leads Designated Safeguarding Officers should mount an enquiry into complaints, allegations, or suspicion of abuse.
- Actions of these sorts carried out by someone other than the Designated Safeguarding Lead or Designated Safeguarding Officer in question, as they could be construed as unjustified interference which could jeopardise an enquiry and any possible subsequent actions.



Responsibilities

All members of the delivery team working with service users have a duty to:

- Understand and fulfil their safeguarding responsibilities as outlined in this policy, policy guidelines, referral procedure and any supporting documents
- Ensure that all data is kept confidential in line with the Pathway Group Privacy Notice and GDPR Statement
- Be familiar with the Keeping Children Safe in Education statutory guidance: It is essential that everybody working in a school or college understands their safeguarding responsibilities. Governing bodies and proprietors should ensure that those staff who work directly with children read at least Part one of this guidance
 - <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Report any safeguarding concerns or disclosures immediately to their Designated Safeguarding Officer or in line with the reporting concerns procedure.
- Follow the formal safeguarding referral procedure implemented in support of this policy.
- Maintain strict confidentiality in line with this policy and guidance from the Designated Safeguarding Lead(s) and Officer(s).
- Engage in all safeguarding training and complete safeguarding assessments and qualifications as required.
- Act on the basis that the welfare of service users is of paramount concern and if in doubt, to immediately seek advice from the Designated Safeguarding Lead(s) and Officer(s).
- Undertake safeguarding training every two years as a minimum, with regular attendance at update briefings as appropriate.

Designated Safeguarding Lead (DSL):

- Hold a Level 4 qualification in safeguarding
- Being available for all staff to discuss any safeguarding issues or concerns
- Ensuring that safeguarding concerns are referred to the appropriate agencies, including prevent concerns
- Ensuring that all staff are fully trained in safeguarding and know how to spot and raise concerns
- Undergoing regular refresher training themselves to ensure their safeguarding knowledge is as up to date as possible and in line with new guidance
- Ensuring that adequate reporting and recording systems are in place for safeguarding procedures
- Ensuring that the safeguarding policies and procedures are up to date with the most recent statutory guidance, and that everyone who has safeguarding duties are familiar with any updates
- Communicating policies and procedures, as well as any concerns or referrals where appropriate
- Complying with any Local Authority requirements
- Ensuring the organisation has sufficient safer recruitment procedures



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- Being aware of any individuals who may require specific safeguarding needs and have specific vulnerabilities

Local Designated Safeguarding Officer (DSO):

- Hold a Level 3 qualification in safeguarding
- Register with their local safeguarding partnership to keep up to date with the latest safeguarding information and training
- Ensure that the members of staff have safe recruitment procedures and keep a register of all members of the delivery team requiring DBS checks and the results of such checks
- Provide support and advice to any member of the members of staff who share a concern or disclosures and notify the Designated Safeguarding Lead
- Immediately investigate significant concerns and refer to the local authority as appropriate
- Input to a central list of relevant local agencies, police and other bodies who might need to be contacted with regards to safeguarding concerns
- Ensure all new members of the members of staff that require DBS checks are identified and that the required information is provided to the DSL to ensure checks take place.
- Input to and deliver training in safeguarding to the members of staff
- Work as part of the central safeguarding team to provide cover for other DSL's
- Ensure that all non-confidential documentation relating to Pathway Group Safeguarding Policy and procedures is made available to all members of staff



Safeguarding Concern Identified

- Ensure person is safe – if there is immediate risk, contact the emergency services.
- Find a suitable safe and secure place to discuss the concern with the person.
- Complete a record of the discussion.
- Inform the person that the concern may be referred to external agencies where required.
- Reassure the person that they have done the right thing in raising concern, share written record.
- Notify and seek IAG from your Designated Safeguarding Officer, if unavailable contact the Designated Safeguarding Lead
- Confirm follow up actions to be carried out.

Safeguarding Officer

- Ensure person and the person reporting the concern is safe and well.
- Upon receiving a Safeguarding Report Form, inform the Designated Safeguarding Lead and complete the online report via <https://pathwaygroup.co.uk/safeguard>
- Complete part 2 of the safeguarding report form.
- Update the safeguarding tracking sheet document.
- Ensure person who raised the concern is provided with relevant IAG.

Safeguarding Lead

- Ensure person and the person reporting the concern is safe and well.
- Collate detailed reports on the concern.
- Information should be logged on the safeguarding tracking sheet document.
- Ensure policy has been followed.
- Ensure support has been provided for the safeguarding officer if relevant.
- Appropriate agencies to be informed where appropriate.
- HR to be informed where appropriate.
- Feedback provided to safeguarding officer.
- Review of case and actions.
- Close case.

Safer Recruitment

Pathway Group will undertake safe recruitment to ensure that all members of the members of staff are fit to work in a training provider setting with potentially vulnerable learners. It also reserves the right to refuse to employ staff whom it has a reasonable belief may pose a risk to its service users.

Pathway Group has systems in place to prevent unsuitable people from working with children or vulnerable adults and to promote safe practice. These systems apply to all new members of the members of staff and require the following checks to be made prior to appointment:

- A minimum of two references, satisfactory to Pathway Group, one of which should be from a previous employer.
- Documentary evidence checks of identify, nationality, residency and “right to work” status.
- DBS checks Enhanced disclosure (Disclosure & Barring Service).
- Documentary evidence of qualifications.
- Satisfactory completion of the probationary period.



- Where subcontractors are delivering courses on behalf of Pathway Group, the provider must provide written assurance that all relevant staff will be DBS checked.

In accordance with the Regulations, records of all checks carried out are kept in a Single Central Register (SCR).

If a DBS check is delayed for any reason the member of the members of staff will not be subject to lone working with service users. They must always have a member of staff present who is fully DBS checked until the point they receive a full DBS check. Should the DBS check be considered unsatisfactory by the DSL, the staff member may be moved into a non-contact role with service users, or their position may be terminated.

Allegations Against Staff

Pathway Group take allegations against any member of staff seriously and believe it is essential that all cases of suspected maltreatment or significant harm are investigated quickly and professionally whatever the validity.

Members of the members of staff should take care not to place themselves in a vulnerable position with an service user or a situation which could be misconstrued.

As our team, can regularly work alone with people, it is important that the Local Designated Safeguarding Officer is made aware of any potential concerns that arise.

If a member of staff suspects any other member of the team of safeguarding malpractice, it is their responsibility to immediately bring these concerns to the Local Designated Safeguarding Officer (DSO) or Designated Safeguarding Lead (DSL) in the interest of the service user and the business.

If the DSO's or DSL's is unavailable, then this concern should be immediately reported to a member of the Pathway Group's, Senior Leadership Team instead.

The Local Designated Safeguarding Officer/ Lead will:

- Provide support and advice to the reporting member of the delivery team including referring to and adhering to Pathway Group Whistleblowing Policy.

Ask the reporting member of the delivery team to provide a written record of their concern following procedures for reporting concerns, which will be housed in the secure safeguarding single central file.

- Consult with a member of the Senior Leadership Team as appropriate.
- In the interest of the business and the service user, immediately seek advice from the relevant Local Authority and/or the Designated Officer from the relevant Local Safeguarding Children's Partnership or Adult Safeguarding Partnership.
- Efficiently act on advice, whether this is to take further investigative action or not.



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Any allegation made against a Designated Safeguarding Lead should be reported directly to a member of the Senior Leadership Team, who will act as above, without notifying the Designated Safeguarding Lead.

All members of staff should be aware of their responsibility to immediately raise concerns, where they exist, about any member of the members of staff, including the Designated Safeguarding Leads. We recognise that our service users cannot be expected to raise concerns in an environment where members of the members of staff fail to do so.

Any allegation made against a Designated Safeguarding Lead should be reported directly to a member of the SMT, who will act as above, without notifying the Designated Safeguarding Lead.

All members of staff should be aware of their responsibility to immediately raise concerns, where they exist, about any member of the members of staff, including the Designated Safeguarding Leads. We recognise that our service users cannot be expected to raise concerns in an environment where members of the members of staff fail to do so.



Types of abuse can include:

Physical abuse

- Assault, hitting, slapping, punching, kicking, hair-pulling, biting, pushing
- Rough handling
- Scalding and burning
- Physical punishments
- Inappropriate or unlawful use of restraint
- Making someone purposefully uncomfortable (e.g. opening a window and removing blankets)
- Involuntary isolation or confinement
- Misuse of medication (e.g. over-sedation)
- Forcible feeding or withholding food
- Unauthorised restraint, restricting movement (e.g. tying someone to a chair)

Signs and indicators of physical abuse could include:

- No explanation for injuries or inconsistency with the account of what happened
- Injuries are inconsistent with the person's lifestyle
- Bruising, cuts, welts, burns and/or marks on the body or loss of hair in clumps
- Frequent injuries
- Unexplained falls
- Subdued or changed behaviour in the presence of a particular person
- Signs of malnutrition
- Failure to seek medical treatment or frequent changes of GP

Domestic violence or abuse

Domestic violence or abuse can be characterised by any of the indicators of abuse outlined in this briefing relating to:

- psychological
- physical
- sexual
- financial
- emotional

Signs and indicators of domestic abuse could include:

- Low self-esteem
- Feeling that the abuse is their fault when it is not
- Physical evidence of violence such as bruising, cuts, broken bones
- Verbal abuse and humiliation in front of others
- Fear of outside intervention



- Damage to home or property
- Isolation – not seeing friends and family
- Limited access to money

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

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:

- acts of assault, threats, humiliation and intimidation
- harming, punishing, or frightening the person
- isolating the person from sources of support
- exploitation of resources or money
- preventing the person from escaping abuse
- regulating everyday behaviour.

Types of sexual abuse

- Rape, attempted rape or sexual assault
- Inappropriate touch anywhere
- Non- consensual masturbation of either or both persons
- Non- consensual sexual penetration or attempted penetration of the vagina, anus or mouth
- Any sexual activity that the person lacks the capacity to consent to
- Inappropriate looking, sexual teasing or innuendo or sexual harassment
- Sexual photography or forced use of pornography or witnessing of sexual acts
- Indecent exposure

Signs and indicators of sexual abuse could include:

- Bruising, particularly to the thighs, buttocks and upper arms and marks on the neck
- Torn, stained or bloody underclothing
- Bleeding, pain or itching in the genital area
- Unusual difficulty in walking or sitting
- Foreign bodies in genital or rectal openings
- Infections, unexplained genital discharge, or sexually transmitted diseases
- Pregnancy in a woman who is unable to consent to sexual intercourse
- The uncharacteristic use of explicit sexual language or significant changes in sexual behaviour or attitude
- Incontinence not related to any medical diagnosis
- Self-harming
- Poor concentration, withdrawal, sleep disturbance
- Excessive fear/apprehension of, or withdrawal from, relationships



- Fear of receiving help with personal care
- Reluctance to be alone with a particular person

Types of psychological or emotional abuse

- Enforced social isolation – preventing someone accessing services, educational and social opportunities and seeing friends
- Removing mobility or communication aids or intentionally leaving someone unattended when they need assistance
- Preventing someone from meeting their religious and cultural needs
- Preventing the expression of choice and opinion
- Failure to respect privacy
- Preventing stimulation, meaningful occupation or activities
- Intimidation, coercion, harassment, use of threats, humiliation, bullying, swearing or verbal abuse
- Addressing a person in a patronising or infantilising way
- Threats of harm or abandonment
- Cyber bullying

Signs and indicators of psychological or emotional abuse could include:

- An air of silence when a particular person is present
- Withdrawal or change in the psychological state of the person
- Insomnia
- Low self-esteem
- Uncooperative and aggressive behaviour
- A change of appetite, weight loss/gain
- Signs of distress: tearfulness, anger
- Apparent false claims, by someone involved with the person, to attract unnecessary treatment

Types of financial or material abuse

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home



- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g. unauthorised use of a car
- Misuse of a power of attorney, deputy, appointeeship or other legal authority
- Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

Signs and indicators of psychological or emotional abuse could include:

- Missing personal possessions
- Unexplained lack of money or inability to maintain lifestyle
- Unexplained withdrawal of funds from accounts
- Power of attorney or lasting power of attorney (LPA) being obtained after the person has ceased to have mental capacity
- Failure to register an LPA after the person has ceased to have mental capacity to manage their finances, so that it appears that they are continuing to do so
- The person allocated to manage financial affairs is evasive or uncooperative
- The family or others show unusual interest in the assets of the person
- Signs of financial hardship in cases where the person's financial affairs are being managed by a court appointed deputy, attorney or LPA
- Recent changes in deeds or title to property
- Rent arrears and eviction notices
- A lack of clear financial accounts held by a care home or service
- Failure to provide receipts for shopping or other financial transactions carried out on behalf of the person
- Disparity between the person's living conditions and their financial resources, e.g. insufficient food in the house
- Unnecessary property repairs

Types of modern slavery

- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to

For more information:

- <https://www.gov.uk/government/collections/modern-slavery>

Signs and indicators of modern slavery abuse could include:

- Signs of physical or emotional abuse



- Appearing to be malnourished, unkempt or withdrawn
- Isolation from the community, seeming under the control or influence of others
- Living in dirty, cramped or overcrowded accommodation and or living and working at the same address
- Lack of personal effects or identification documents
- Always wearing the same clothes
- Avoidance of eye contact, appearing frightened or hesitant to talk to strangers
- Fear of law enforcers

Discriminatory abuse

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (known as 'protected characteristics' under the Equality Act 2010)
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic
- Denying access to communication aids, not allowing access to an interpreter, signer or lip-reader
- Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- Substandard service provision relating to a protected characteristic

Signs and indicators of discriminatory abuse could include:

- The person appears withdrawn and isolated
- Expressions of anger, frustration, fear or anxiety
- The support on offer does not take account of the person's individual needs in terms of a protected characteristic

Organisational or institutional abuse

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care
- Abusive and disrespectful attitudes towards people using the service
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication
- Failure to provide care with dentures, spectacles or hearing aids



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- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately
- Interference with personal correspondence or communication
- Failure to respond to complaints

Signs and indicators of organisational or institutional abuse could include:

- Lack of flexibility and choice for people using the service
- Inadequate staffing levels
- People being hungry or dehydrated
- Poor standards of care
- Lack of personal clothing and possessions and communal use of personal items
- Lack of adequate procedures
- Poor record-keeping and missing documents
- Absence of visitors
- Few social, recreational and educational activities
- Public discussion of personal matters
- Unnecessary exposure during bathing or using the toilet
- Absence of individual care plans
- Lack of management overview and support

Neglect and acts of omission

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation and activity, personal or medical care
- Providing care in a way that the person dislikes
- Failure to administer medication as prescribed
- Refusal of access to visitors
- Not taking account of individuals' cultural, religious or ethnic needs
- Not taking account of educational, social and recreational needs
- Ignoring or isolating the person
- Preventing the person from making their own decisions
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity

Signs and indicators of neglect and acts of omission could include:

- Poor environment – dirty or unhygienic
- Poor physical condition and/or personal hygiene
- Pressure sores or ulcers
- Malnutrition or unexplained weight loss
- Untreated injuries and medical problems
- Inconsistent or reluctant contact with medical and social care organisations
- Accumulation of untaken medication
- Uncharacteristic failure to engage in social interaction



- Inappropriate or inadequate clothing

Self-neglect

- Lack of self-care to an extent that it threatens personal health and safety
- Neglecting to care for one's personal hygiene, health or surroundings
- Inability to avoid self-harm
- Failure to seek help or access services to meet health and social care needs
- Inability or unwillingness to manage one's personal affairs

Signs and indicators of self harm could include:

- Very poor personal hygiene
- Unkempt appearance
- Lack of essential food, clothing or shelter
- Malnutrition and/or dehydration
- Living in squalid or unsanitary conditions
- Neglecting household maintenance
- Hoarding
- Collecting a large number of animals in inappropriate conditions
- Non-compliance with health or care services
- Inability or unwillingness to take medication or treat illness or injury

Bullying

There is no legal definition of bullying. But it is usually defined as repeated behaviour which is intended to hurt someone either emotionally or physically, and is often aimed at certain people because of their race, religion, gender or sexual orientation or any other aspect such as appearance or disability.

Bullying can take many forms including:

- Physical assault
- Social bullying
- Threatening behaviour
- Name calling
- Cyberbullying/online bullying which is via social networking sites, gaming sites, chat rooms or anywhere online. Being bullied online can have a devastating impact on anyone experiencing it and it can be really hard to get it to stop
- Sexualised bullying

Harassment, abuse and intimidation

In the UK, the terms 'harassment', 'intimidation' and 'abuse' are often used interchangeably as the experience for victims can overlap. The Home Office and the Department of Health Guidance on



Developing and Implementing Multi-agency Policies and Procedures to Protect Vulnerable Adults from Abuse define abuse as a single act or repeated physical, verbal or psychological acts that violate an individual's human and civil rights. Some cases of abuse constitute criminal offences. For example, physical, psychological or sexual assault, theft, fraud and gender and racial discrimination.

The Protection from Harassment Act 1997 indicates that someone's actions amount to harassment when they make the victim feel distressed, humiliated, threatened or fearful of further violence. The main goal of harassment is to persuade victims either not to do something that they are entitled or required to do or to do something that they are not obliged to do. Actions listed under the Protection from Harassment Act include, but are not limited to:

- Phone calls
- Letters
- Emails
- Visits
- Stalking
- Verbal abuse of any kind, including on social media
- Threats
- Damage to property
- Bodily harm

Such actions amount to harassment when they occur more than once.

Coercion is defined as the action of forcefully persuading or threatening an individual to do something which includes behaviours, such as blackmail, extortion, threats or physical and sexual assaults could also be considered as a form of harassment.

Public intimidation is defined as "words and/or behaviour intended or likely to block, influence or deter participation in public debate or causing alarm or distress which could lead to an individual wanting to withdraw from public life". This includes actions of abuse, harassment and intimidation such as: verbal abuse; physical attacks; being stalked followed or loitered around; threats of harm; distribution of misinformation; character assassination; inappropriate emails, letters, phone calls and communications on social media; sexual harassment or sexual assault; and other threatening behaviours, including malicious communications such as poison pen letters, indecent or grossly offensive emails or graphic pictures that aim to cause distress or anxiety.

Forced Marriage

A forced marriage is where one or both people do not or cannot consent to the marriage and pressure or abuse is used to force them into the marriage. It is also when anything is done to make someone marry before they turn 18, even if there is no pressure or abuse.

Forced marriage is illegal in the UK. It is a form of domestic abuse and a serious abuse of human rights.



The pressure put on people to marry against their will may be:

- physical: for example, threats, physical violence or sexual violence
- emotional and psychological: for example, making someone feel like they are bringing 'shame' on their family

Financial abuse, for example taking someone's wages, may also be a factor.

For more information: <https://www.gov.uk/guidance/forced-marriage>

County Lines

County Lines is where illegal drugs are transported from one area to another, often across police and local authority boundaries (although not exclusively), usually by children or vulnerable people who are coerced into it by gangs. The 'County Line' is the mobile phone line used to take the orders of drugs. Importing areas (areas where the drugs are taken to) are reporting increased levels of violence and weapons-related crimes as a result of this trend.

Signs and indicators of the exploitation of young and vulnerable people:

- An increase in visitors and cars to a house or flat
- New faces appearing at the house or flat
- New and regularly changing residents (e.g different accents compared to local accent)
- Change in resident's mood and/or demeanour (e.g. secretive/ withdrawn/ aggressive/ emotional)
- Substance misuse and/or drug paraphernalia
- Changes in the way young people you might know dress
- Unexplained, sometimes unaffordable new things (e.g clothes, jewellery, cars etc)
- Residents or young people you know going missing, maybe for long periods of time
- Young people seen in different cars/taxis driven by unknown adults
- Young people seeming unfamiliar with your community or where they are
- Truancy, exclusion, disengagement from school
- An increase in anti-social behaviour in the community
- Unexplained injuries

For more information: <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines>

Prevent Duty – Radicalisation & Extremism

The Prevent duty requires all education providers 'to have due regard to the need to prevent people from being drawn into terrorism'.

In summary, terrorism is an action that:



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- endangers or causes serious violence to a person or people
- causes serious damage to property, or seriously interferes with or disrupts an electronic system
- is designed to influence the government or to intimidate the public

'Extremism' is the vocal or active opposition to the fundamental British values of:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect
- Tolerance of people with different faiths and beliefs

Extremism also includes calls for the death of members of the armed forces, whether in this country or overseas. Some groups and organisations that promote extremist ideologies are not proscribed terrorist groups or organisations.

For more information

- <https://pathwaygroup.co.uk/prevent/>
- <https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/the-prevent-duty-an-introduction-for-those-with-safeguarding-responsibilities>
- <https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/understanding-and-identifying-radicalisation-risk-in-your-education-setting>

Making a referral to Prevent

- <https://www.gov.uk/guidance/making-a-referral-to-prevent>
- <https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance>

Sexism (Gender/Sex discrimination)

Men and women have the right not to be discriminated against at work because of their gender.

The abuse can consist of verbal or physical manifestations of a sexual nature that intimidate, offend, denigrate or pressure the person who suffers it, being a woman more often than a man, such as:

- Derogatory comments
- Objectification
- Sexist humour or jokes
- Overfamiliar remarks
- Silencing or ignoring people
- Gratuitous comments about dress and physical appearance
- Sexist body language



- Lack of respect
- Masculine practices which intimidate or exclude women and favour fellow men

Misogyny

Misogyny is the hatred of, contempt for, or prejudice against women or girls.

- Objectifying women.
- Belittling women or girls in conversation, such as using sexist nicknames or using derogatory remarks.
- Seeking to control women's behaviour.
- Using intimidating or humiliating behaviour to destroy a woman's self-confidence and undermine her.
- Discriminating against women, for example a woman is not offered a job that she is qualified for because she is a woman or it is assumed that a woman can't do something because she is a woman.
- Having double standards where men are viewed in a lenient way and women tend to be criticised.
- Treating women differently from men in social and professional settings.
- Threatening, aggressive, intimidating, or violent behaviour.
- Pursuing unwanted sexual comments or advances, including catcalling, stalking, staring, touching, taking pictures without consent, exposure to sexual assault and rape.
- Controlling, confident and self-centred behaviour, as well as competitive.

Involuntary celibates or 'incels'

Incels, are men who blame the world, and especially women, for the fact that they are virgins, or aren't having sex as often as they want to. They see women as manipulators who choose powerful but shallow men, and unfairly ignore and even torment 'good guys' like themselves. Resentment becomes an excuse for misogyny, and sometimes, for violence. 'Incels' are a hate group.

Incels have created a unique lexicon used to describe a range of things such as ideologies, race, gender and the phrases are often derogatory in origin and are used to describe people of different genders and race.

- Beta – This is used to describe a man who is physically or mentally weak and is the opposite of an 'alpha male'.
- Chad – Chad is used to describe a man who is handsome, intelligent and charismatic. Chads are ultimately the opposites of incels and can be admired and loathed in some circles.
- Cuck – The term was not created by incels, but cuck is an abbreviation of the word cuckold which is used to describe a the husband of an adulterous wife.

For more information

- <https://pathwaygroup.co.uk/incel/>



Wellbeing & Welfare Support

Wellbeing relates to:

- Physical and mental health and emotional wellbeing;
- Protection from abuse and neglect;
- Education, training and recreation;
- Domestic, family and personal relationships;
- Contribution made to society;
- Securing rights and entitlements;
- Social and economic wellbeing;
- Suitability of living accommodation.

Mental Health

Mental health includes our emotional, psychological, and social well-being. It affects how we think, feel, and act. It also helps determine how we handle stress, relate to others, and make choices. Mental health is important at every stage of life, from childhood and adolescence through adulthood.

Positive mental health allows people to realise their full potential, cope with the stresses of life, work productively and make meaningful contributions to their communities

Ways to maintain positive mental health include:

- Getting professional help if you need it
- Connecting with others
- Staying positive
- Getting physically active
- Helping others
- Getting enough sleep
- Developing coping skills

Signs and indicators of the poor mental health:

- Eating or sleeping too much or too little
- Pulling away from people and usual activities
- Having low or no energy
- Feeling numb or like nothing matters
- Having unexplained aches and pains
- Feeling helpless or hopeless
- Smoking, drinking, or using drugs more than usual
- Feeling unusually confused, forgetful, on edge, angry, upset, worried, or scared
- Yelling or fighting with family and friends
- Experiencing severe mood swings that cause problems in relationships



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- Having persistent thoughts and memories you can't get out of your head
- Hearing voices or believing things that are not true
- Thinking of harming yourself or others
- Inability to perform daily tasks like taking care of your kids or getting to work or school

For more information

- <https://www.nhs.uk/mental-health/>
- <https://www.mentalhealth.org.uk/>
- <https://www.mind.org.uk/>

Addictions

Addiction is defined as not having control over doing, taking or using something to the point where it could be harmful to you.

Addiction is most commonly associated with gambling, drugs, alcohol and smoking, but it's possible to be addicted to just about anything, including:

- work – some people are obsessed with their work to the extent that they become physically exhausted; if your relationship, family and social life are affected and you never take holidays, you may be addicted to work
- internet – as computer and mobile phone use has increased, so too have computer and internet addictions; people may spend hours each day and night surfing the internet or gaming while neglecting other aspects of their lives
- solvents – volatile substance abuse is when you inhale substances such as glue, aerosols, petrol or lighter fuel to give you a feeling of intoxication
- shopping – shopping becomes an addiction when you buy things you don't need or want to achieve a buzz; this is quickly followed by feelings of guilt, shame or despair

For more information

- <https://www.nhs.uk/live-well/addiction-support/>

Knife Crime

The increasing problem of knife crime is rarely out of the news, however there is a need to ensure that response are measured and informed, not guided by knee-jerk reactions to media headlines and what is trending on social media. There is also an overriding need to look at the safeguarding issues for the young people involved in knife crime, particularly for those who are then labelled as the perpetrator and the connotations that label brings with it.

Organisations working with young people are often in a difficult position, with a fine line to walk between addressing the issue at hand whilst supporting all those involved.

In England, it is illegal to:



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- Sell a knife to anyone under 18, unless it is a knife with a folding blade that is three inches long or less
- Carry a knife in public without good reason, unless it is a knife with a folding blade that is three inches long or less
- Carry, buy or sell any banned knife
- Use any knife in a threatening way, even if it is a legal one

Localised Risks

It's important for people to understand that in today's world, crime and risks are a reality that we all face daily. Therefore, people need to be aware of their local area's specific risks and dangers to protect themselves and their loved ones.

However, many people are often unaware of the crime trends in their locality and may not take adequate precautions to safeguard their homes and belongings.

Staying informed about; local crime and risks, it is essential to follow the updates and guidelines provided by the local police force, authority, and community groups. By staying up to date with the latest information, individuals can take proactive measures to prevent crime and ensure safety.

	Greater London	Greater Manchester	West Midlands
Police Service	met.police.uk/	gmp.police.uk/	west-midlands.police.uk
	@metpoliceuk	@gtrmanchesterpolice	@westmidlandspolice
Local Authority	london.gov.uk	greatermanchester-ca.gov.uk	wmca.org.uk
	@mayoroflondon	@greatermcr	@westmidlandsca

	Staffordshire	West Yorkshire	Cambridgeshire & Peterborough
Police Service	staffordshire.police.uk	westyorkshire.police.uk	cambs.police.uk
	@staffordshirepolice	@WestYorkshirePolice	@CambsCops
Local Authority	staffordshire.gov.uk	westyorks-ca.gov.uk	cambridgeshirepeterborough-ca.gov.uk
	@yourstaffordshire	@TheCombinedAuthority	@CambsPboroCA

If you are unable to find information about crime and risks in your region in the table above, you can still stay informed by visiting local websites dedicated to crime reporting and safety measures.



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In that case, you can still stay informed by visiting local websites dedicated to crime reporting and safety measures.

Many communities have their police department or local government websites that provide regular updates on crime and safety concerns. These sites often include information on recent criminal activity, safety tips, and ways to report suspicious behaviour.

You can also check with your local news outlets to stay current on developing stories about crime and safety in your area. You can help keep yourself and your community safe by visiting, informing and taking necessary precautions.

- <https://www.police.uk/>
- <https://www.nationalcrimeagency.gov.uk/>

If you are unsure of your regional contacts, please contact our Safeguarding Team, <https://pathwaygroup.co.uk/safeguard>.

Confidentiality & Information Sharing

Pathway Group recognise that all matters relating to safeguarding are confidential, but all members of the members of staff must act on the basis that the safety of the service user is the overriding concern. The degree of confidentiality will be governed by the need to protect the service user.

The Local Designated Safeguarding Officer will disclose any information about an service user or concern to other members of the members of staff, the service user's employer or other external agencies on a need-to-know basis only.

All members of staff must be aware that they have a responsibility to immediately disclose information which if not shared, may compromise a service user's safety or welfare; all members of staff will be fully supported by their Local Designated Safeguarding Officer.

Peer-on-Peer abuse /child-on-child abuse / harmful sexual behaviour including sexual violence and sexual harassment

Sexual harassment is unwanted conduct of a sexual nature.

In most instances, the conduct of service users towards each other will be covered by our Behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns.

Pathway Group recognises that service users are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'.

Harmful sexual behaviour can include:

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an individual against a current or former dating partner regardless of gender or sexuality.
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- Harmful Sexual Behaviour –service users presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.
- Upskirting - 'upskirting' is now a criminal offence and is defined as "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" (DfE, 2019).



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Reporting a concern

If you suspect or know that a service user is at risk, then you must report this to your Local Designated Safeguarding Officer (DSO) or Designated Safeguarding Lead (DSL).

If you do not feel that the service user is at immediate risk, then this can be via phone call or by completing and sending the Safeguarding and Prevent Concern form via:

<https://pathwaygroup.co.uk/safeguard>

If, however you feel that the service user learner is at immediate risk then it is your responsibility to ensure that you speak directly to a designated person within Pathway Group and that they acknowledge this. It is not acceptable to leave a message.

Report such concerns by phoning your Designated Safeguarding Lead or, if they are unavailable, the Local Designated Safeguarding Officer. If in the event that the DSL is unavailable, then you must report this to a member of the Pathway Group Senior Leadership Team.



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Regional Base	Name of DSL	DSL Email	DSL Contact No.
West Midlands	Sajad Ali	sajad@pathwaygroup.co.uk	07531 866922 0121 707 0550
West Midlands	Martin Chandler, Prevent Officer	martin.chandler@pathwaygroup.co.uk	07943 212217 0121 707 0550

Regional Base	Name of DSO	DSO Email	DSO Contact No.
Staffordshire	Nadia Brown	nadia.brown@pathwaygroup.co.uk	01782 365 365
West Midlands	Connor Butler	connor.butler@pathwaygroup.co.uk	07377 735348 01922 870 050



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Our Key Safeguarding Messages

- Safeguarding means to protect people from abuse, harm and neglect.
- Recognise, Respond, Report, Record & Refer
- Everyone has the right to live, learn and work in safety, free from abuse, harm and neglect.
- Safeguarding for all - it is everyone's responsibility.
- It's probably nothing, but... If you see or hear something that doesn't seem right no matter how minor, trust your instincts, record it and report so that we can monitor.
- We're here to help