

Safeguarding and Child Protection Policy

Document control	Detail
Policy title	Safeguarding and Child Protection Policy
Version	3.0
Status	Approved for use
Policy owner	Hannah Lewis – Education Lead / Designated Safeguarding Lead
Approved by	Nathan Warr
Applies to	Directors, employees, tutors, associate tutors, subcontractors, volunteers and any person working on behalf of PACE Education Pathways
Approval date	21/08/2026
Next review date	12 months from approval, or earlier where a review trigger applies
Review trigger	Earlier review following changes to statutory guidance, local safeguarding arrangements, commissioner requirements, the service model, a serious incident, allegation, complaint, audit finding or safeguarding learning.
Linked documents	Managing Allegations Against Staff Policy; Staff Code of Conduct and Low-Level Concerns Policy; Safer Recruitment, DBS and Staff Suitability Policy; Lone Working and Home Visit Policy; Attendance and Engagement Policy; Incident Reporting Policy; Data Protection and UK GDPR Policy; Online Safety and Acceptable Use Policy; Prevent, Extremism and Radicalisation Policy; Behaviour, De-escalation and Physical Intervention Policy; Medication and First Aid Policy; Pupil Risk Assessment; Home Visit Risk Assessment; Child Transport & Travel Risk Assessment; Off-Site Learning Activity Risk Assessment; Online / Remote Learning Risk Assessment; Safeguarding Concern Form; Workforce Competency and Compliance Register.

Governance note

Safeguarding is the priority framework across the PACE policy suite. Where any policy, procedure, risk assessment, form or operational decision identifies risk of harm, a disclosure, an allegation against an adult, unsafe practice or a concern for a child's welfare, safeguarding procedures take priority. Concerns about adults are managed under the Managing Allegations Against Staff Policy and the Staff Code of Conduct and Low-Level Concerns Policy; concerns must not be delayed while another internal process is completed.

1. Purpose

PACE Education Pathways Ltd is committed to safeguarding and promoting the welfare of children and young people. This policy explains how PACE prevents harm, recognises concerns, responds to disclosures, records and shares information, manages escalation and works with commissioners and statutory agencies.

PACE provides 1:1 alternative provision, tutoring, mentoring, re-engagement and reintegration support. Because delivery may take place in homes, community venues, schools, online and during authorised travel, safeguarding arrangements must remain practical, visible and responsive to changing risk.

2. Scope

This policy applies to all directors, employees, tutors, associate tutors, subcontractors, volunteers and any person working on behalf of PACE. It applies to face-to-face and online teaching, home visits, community-based work, off-site learning, authorised transport, communications with pupils and families, and liaison with schools, local authorities and other professionals.

3. Statutory and guidance framework

PACE will apply the current safeguarding framework in England. At the date of this draft, Keeping Children Safe in Education 2025 remains in force until 31 August 2026; Keeping Children Safe in Education 2026 comes into force on 1 September 2026. This policy is also informed by Working Together to Safeguard Children 2026, the Children Acts 1989 and 2004, the Education Act 2002 where relevant, the Prevent duty, the Equality Act 2010, UK GDPR and the Data Protection Act 2018, and applicable local safeguarding partnership and LADO procedures.

PACE will review this policy when statutory guidance changes and will not rely on an outdated edition where a newer version has come into force.

4. Safeguarding principles

- Safeguarding is everyone's responsibility and the welfare of the child is paramount.
- Concerns must be acted on promptly; staff must never assume that someone else has reported or acted.
- Information will be shared lawfully, proportionately and on a need-to-know basis where necessary to protect a child.
- PACE will listen to children and take account of age, communication needs, SEND, trauma, culture and individual circumstances without making assumptions.
- Commissioning arrangements do not remove PACE's responsibility to act where a child may be at risk.
- Where risk cannot be safely controlled, a session or activity must be paused, changed or ended.

5. Roles and responsibilities

Role	Safeguarding responsibilities
Designated Safeguarding Lead (DSL)	Lead responsibility for safeguarding and child protection; receive and assess concerns; make or coordinate referrals; liaise with commissioners, schools, children's social care, police, Prevent and LADO routes as appropriate; oversee records, training and safeguarding review.
Deputy Safeguarding Lead / Governance Lead	Provide cover and escalation where the DSL is unavailable or conflicted; support audit, incident review, safer recruitment assurance, policy control and commissioner evidence.
Directors	Ensure suitable safeguarding arrangements, competent safeguarding leadership, resources, governance oversight and appropriate external escalation.
All staff / tutors / volunteers	Read and follow this policy; remain alert to signs of harm; report concerns promptly; record facts accurately; maintain professional boundaries; follow risk assessments; cooperate with safeguarding enquiries.

Role	Safeguarding responsibilities
Commissioner / referring organisation	Provide relevant safeguarding and risk information, named safeguarding contacts and agreed escalation routes; cooperate with review and information sharing.

6. Safer recruitment, suitability and induction

PACE will not permit an adult to undertake unsupervised regulated activity with children until the required safer recruitment and suitability checks are complete. Checks will be recorded through the Single Central Record and Workforce Competency and Compliance Register and will include, where applicable, identity, right to work, references, qualifications, enhanced DBS, children's barred list information, prohibition checks, overseas checks and role-specific suitability evidence.

Safeguarding induction must be completed before pupil contact. Staff must understand reporting routes, professional boundaries, low-level concerns, allegations, online safety, Prevent, lone working, incident reporting and the risk-assessment controls relevant to their role.

7. Recognising abuse, neglect, exploitation and harm

Safeguarding concerns may arise from a child's disclosure, physical signs, behaviour, attendance, online activity, information from a parent or professional, or a change in presentation. Staff must consider patterns and context rather than waiting for a single definitive incident.

- physical abuse, emotional abuse, sexual abuse and neglect;
- domestic abuse, child sexual exploitation, child criminal exploitation, county lines and serious youth violence;
- child-on-child abuse, bullying, sexual harassment, sexual violence and harmful sexual behaviour;
- online harm, grooming, image sharing, cyber abuse and technology-facilitated exploitation;
- radicalisation and extremist influence;
- missing episodes, exploitation outside the home and unsafe adults;
- self-harm, suicidal ideation, substance misuse and serious deterioration in emotional wellbeing;
- forced marriage, female genital mutilation, modern slavery and other forms of abuse or exploitation.

8. Additional vulnerability in alternative provision

Children referred to alternative provision may have experienced exclusion, disrupted education, unmet SEND, trauma, anxiety, emotionally based school avoidance, family stress, exploitation, poor attendance or low trust in adults. These circumstances do not automatically indicate harm, but they can increase vulnerability and make direct disclosure less likely.

Staff should therefore pay attention to patterns such as unexplained absence, sudden disengagement, reluctance to return home, unexplained gifts, new older peers, hunger, deterioration in hygiene, repeated injuries, significant changes in mood, sexualised language, unusual online contact or changes in family presentation.

9. Responding to a disclosure or concern

1. Ensure immediate safety. If there is immediate danger, serious injury or a life-threatening situation, call 999 or seek emergency assistance first.
2. Listen calmly. Do not interrogate, investigate or ask leading questions.
3. Do not promise confidentiality. Explain that information may need to be shared to help keep the child safe.
4. Record the concern as soon as possible, using the child's own words where relevant and distinguishing fact, observation and professional judgement.
5. Report the concern to the DSL as soon as possible and normally on the same working day. Immediate or serious concerns must be escalated without delay.
6. Follow any further instruction from the DSL, commissioner or statutory agency and continue to record material developments.

10. Recording and safeguarding systems

Safeguarding concerns must be recorded on the approved safeguarding system (MyConcern) as soon as reasonably practicable. Attendance must be recorded on DC Pro in accordance with the Attendance and Engagement Policy. Staff must not keep safeguarding information only in personal notebooks, private email accounts, informal messaging threads or personal devices.

Records must be factual, dated, timed and attributable to the person making the record. They should include what was seen or heard, who was present, immediate action, who was informed, decisions made, rationale and follow-up requirements.

11. Reporting and escalation

The DSL will review reported information, assess risk, consider existing records and decide whether advice, referral, commissioner notification or parent/carer contact is required. Where the pupil is commissioned by a school or local authority, relevant safeguarding concerns will normally be shared with the named safeguarding contact unless doing so would increase risk or conflict with statutory-agency advice.

If a staff member believes a safeguarding concern has not been handled appropriately, they must escalate to the Deputy DSL/Governance Lead, the commissioning safeguarding lead, children's social care, police or another appropriate safeguarding route. Internal hierarchy must never delay protection of a child.

12. Allegations against adults and low-level concerns

Allegations and concerns about adults are managed under the PACE Managing Allegations Against Staff Policy and Staff Code of Conduct and Low-Level Concerns Policy. Any information suggesting that an adult may have harmed a child, may have committed an offence against or related to a child, may pose a risk of harm to children, or may be unsuitable to work with children must be reported immediately to the DSL and Governance Lead, subject to conflict-of-interest arrangements.

Where the allegation threshold may be met, PACE will seek LADO advice without delay. Low-level concerns must also be recorded and reviewed so that patterns can be identified. A concern about the DSL must be reported to the alternate safeguarding/governance lead; a concern about a Director must be escalated to the other Director and/or LADO as appropriate. The person who is the subject of an allegation must not manage their own case.

13. Child-on-child abuse and harmful sexual behaviour

PACE will take child-on-child abuse seriously and will not dismiss harmful conduct as banter, drama or normal behaviour. Concerns may arise during PACE activity or through information disclosed during 1:1 work. The DSL will consider the needs and safety of all children involved and liaise with the commissioner and statutory agencies where required.

14. Attendance, missing and disengagement concerns

Attendance and engagement are safeguarding indicators. Unexplained absence, repeated cancellation, sudden withdrawal or inability to contact a family must be managed in accordance with the Attendance and Engagement Policy and the individual pupil risk assessment. Where there is concern that a child may be missing or at immediate risk, safeguarding action must not wait for routine attendance reporting.

15. Online safety, Prevent and digital safeguarding

Online safety and Prevent concerns are safeguarding matters. Staff must use approved communication routes, follow the Online Safety and Acceptable Use Policy and report concerning online content, grooming, image sharing, extremist influence or boundary concerns to the DSL. Staff must not undertake covert investigation or search devices unless lawfully authorised and competent to do so.

16. Lone working, home visits, transport and off-site activity

Safeguarding must be integrated with PACE risk assessment. Before delivery, staff must follow the relevant standardised assessment: Pupil Risk Assessment, Home Visit Risk Assessment, Child Transport & Travel Risk Assessment, Off-Site Learning Activity Risk Assessment or Online / Remote Learning Risk Assessment. These assessments require formal decision, ownership, review and dynamic reassessment where circumstances change.

Staff must stop, pause or modify provision where an unsafe adult, aggression, intoxication, weapons, uncontrolled animals, unsafe premises, serious behavioural risk, unsafe handover, transport concern or another material safeguarding risk prevents safe delivery.

17. Information sharing and confidentiality

PACE will handle information lawfully and securely. Safeguarding information may be shared without consent where necessary to protect a child, support statutory safeguarding functions or where seeking consent would increase risk or prejudice protective action. Staff must never promise absolute confidentiality to a child.

Information sharing decisions should be necessary, proportionate, relevant and recorded. Where statutory guidance, commissioner arrangements or local procedures impose a specific information-sharing route, PACE will follow it.

18. Working with parents, carers and commissioners

PACE will work respectfully with parents and carers while keeping the child's welfare central. Parents/carers will normally be informed of concerns unless there is a safeguarding reason not to do so, such as increased risk, risk of evidence being destroyed, risk of a child being silenced, or advice from police or children's social care not to inform them.

Commissioning arrangements must identify safeguarding contacts, attendance reporting, incident escalation, emergency routes and information-sharing expectations before provision begins wherever practicable.

19. Risk assessment and safeguarding review

Safeguarding information must inform pupil, location, transport, online and activity risk assessments. A material safeguarding change requires review of the relevant assessment before the activity continues where the change could alter risk. Reviews must record the assessor, reviewer/authoriser, decision, residual risk, controls, review date and review history in accordance with the standard PACE risk-assessment framework.

20. Training, supervision and staff support

All staff must complete safeguarding induction before working with pupils and receive refresher training appropriate to role and statutory expectations. The DSL and Deputy DSL must maintain appropriate safeguarding-lead training and knowledge of local arrangements. Supervision and case review should be used to discuss safeguarding, professional boundaries, risk, difficult decisions and staff wellbeing.

21. Whistleblowing and unsafe practice

Staff must raise concerns about unsafe safeguarding practice, concealment, failure to act, poor safeguarding culture or attempts to suppress concerns. Whistleblowing is an additional safeguard and does not replace immediate safeguarding action where a child may be at risk.

22. Quality assurance, monitoring and review

The DSL and Governance Lead will review safeguarding practice through safeguarding records, incident and attendance patterns, low-level concerns and allegations, training compliance, safer recruitment evidence, risk-assessment reviews, commissioner feedback and audit findings. Significant learning will be reflected in policies, training, supervision and operational controls.

This policy will be reviewed at least annually and earlier where legislation or statutory guidance changes, safeguarding arrangements change, an allegation or serious incident occurs, a commissioner or audit identifies a gap, or the PACE service model materially changes.

23. Safeguarding action flow

Stage	Action	Owner	Record
1. Concern noticed / disclosed	Listen, observe, keep the child safe, avoid leading questions and do not promise confidentiality.	Staff / tutor	Initial factual notes
2. Report internally	Inform DSL as soon as possible; immediate risk must be escalated without delay.	Staff / tutor	MyConcern / Safeguarding Concern record
3. DSL decision	Assess risk, review existing information, decide advice/referral, information sharing and parent/carer contact.	DSL	DSL decision / chronology
4. External escalation	Contact children's social care, police, LADO, Prevent, school or local authority as required.	DSL / delegated lead	Referral / advice / communication record
5. Follow-up	Record outcomes, update risk assessments, inform commissioner where appropriate, review controls and monitor patterns.	DSL / Governance Lead	Chronology / review record

Appendix A – Local safeguarding contacts

The following contact information is carried forward from the existing PACE safeguarding policy and must be verified against current local authority arrangements before this Version 3.0 policy is approved for use.

Contact	Details
BCP Children's Services / MASH	01202 123334 / childrensfirstresponse@bcpcouncil.gov.uk
Dorset Children's Services / MASH	01305 225580 / Dorset Council worried-about-a-child route
Local Authority Designated Officer (LADO)	Dorset: 01305 221122 / lado@dorsetcouncil.gov.uk; BCP: 01202 817600 / LADO@bcpcouncil.gov.uk
Out-of-hours children's social care	Dorset: 01305 221000; BCP: 01202 738256
Police	999 emergency / 101 non-emergency
NSPCC helpline	0808 800 5000
Prevent advice / referral route	Use current GOV.UK Prevent referral/advice route
Commissioner safeguarding contact	To be completed for each pupil placement

Appendix B – Approval and review

Role	Name	Signature / approval record	Date
Policy owner	Hannah Lewis – Education Lead / DSL		
Governance approval	Nathan Warr – Operations / Governance Lead / Deputy DSL		