



PASTways

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Signed: *Patricia Booth*

Safeguarding Policy

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PASTways Designated persons are:

Mrs P Booth, Manager DSL (Designated Safeguarding Lead)

Pat.Booth@Pastways.org

0114 2457855

Mobile 07500 771400

Mrs S Morton DSD (Designated Safeguarding Deputy)

Sarah.Morton@Pastways.org

0114 2457855

Mobile 07483 344587

Mr W Beever DSD (Designated Safeguarding Deputy)

William.beever@pastways.org

0114 2457855

Without the DSL / DSD, the following support officers in PASTways can assist.

Shannon Hatfield

Designated Board Member

Matthew Barrett

(Chairperson) Contact through PASTways 0114 2457855

Local Authority Designated Officer (LADO) 0114 2734855 (Option 1)

Email - lado@sheffield.gov.uk

The Designated Persons will liaise and build good relationships with schools and other agencies.

The Manager deals with allegations made against staff.

Allegations made against the Manager are dealt with first by the Chairperson of the Board of Directors.

Aims

PASTways is fully committed to safeguarding and promoting the welfare of all children and young people in our care. As an Alternative Provision (AP) setting, we recognise that many of our learners may be particularly vulnerable and require a proactive, robust approach to safeguarding.

Safeguarding is everyone's responsibility. We maintain a culture of vigilance where all staff understand that safeguarding is central to every aspect of our work. This policy outlines how we fulfil our statutory responsibilities under Keeping Children Safe in Education (2025) and ensure a safe, supportive environment where every learner can thrive.

Safeguarding Ethos

We aim to provide a setting where young people feel safe, listened to, and supported. Safeguarding is embedded into the culture of our provision, and we foster open communication between staff, learners, parents/carers, and commissioning schools. Our approach is underpinned by a commitment to protect all children and young people from physical, emotional, and sexual abuse, neglect, and the emerging risks of online harms and exploitation.

Responsibilities as an Alternative Provision

In accordance with the strengthened safeguarding expectations for Alternative Provision outlined in KCSIE 2025, PASTways will:

Provide written confirmation to all commissioning schools and local authorities that appropriate safer recruitment checks have been carried out on all staff, including enhanced DBS and barred list checks, and, where applicable, Section 128 checks.

Promptly notify commissioning schools of any staffing changes that may impact the safeguarding of learners.

Maintain accurate records of all site locations and pupil placements, which will be shared with commissioning partners upon request.

Support schools in meeting their statutory requirement to review placements on a termly basis, including contributing to safeguarding reviews and providing timely updates on any concerns that may affect the appropriateness of the placement.

Safeguarding and Emerging Technologies

We acknowledge the increasing safeguarding challenges posed by digital environments, including online misinformation, disinformation, and the misuse of generative artificial intelligence (AI). PASTways regularly reviews its filtering and monitoring systems using the Department for Education's (DfE) "Plan Technology for Your School" self-assessment tool and implements guidance relating to cyber resilience and responsible AI use.

Principles

This project recognises its legal and moral duty to promote the well-being of children, protect them from harm and respond to any form of child abuse accordingly and appropriately.

We believe that every child, regardless of age, always has and in all situations a right to feel safe and protected from any situation or practice that results in a child being physically or psychologically affected or damaged.

We agree that we have primary responsibility for the care, welfare, and safety of the students in our charge. We will fulfil this duty through our teaching and learning, pastoral care, and other activities that involve our students.

To achieve this, all PASTways staff (including volunteers and board members) and those associated with this project in any capacity will always act proactively on child welfare matters, especially where a child may be at risk of significant harm.

PASTways seeks to adopt an open and accepting attitude towards children as part of our pastoral care responsibility. We understand that students with protected characteristics, as of the Equality Act 2010, may be more at risk of abuse/harassment/bullying. PASTways will take positive steps to support students who face disadvantages and make them feel safe and secure.

The project hopes that its students, staff, board members, parents, and anyone associated with the project directly or otherwise (including our neighbours and broader community members) will feel free to discuss any concerns and view the project as a safe place to do so. Furthermore, we hope the students will view the project as a safe space if they encounter difficulties at home.

Additionally, we will communicate with parents and carers about the importance of keeping children safe, primarily online at home. We will clarify to parents that while at PASTways, students will be protected by a firewall, and their internet searches will be monitored. To keep students safe online at home, we will keep parents informed of what we are asking students to access at home and when a student will be interacting with adults from the project at home.

If our students seek help from a staff member, their fears and worries will be taken seriously. However, staff cannot promise 'secrecy' if concerns are such that a referral must be made to the Designated Safeguarding Lead or Deputy, or, where appropriate, other agencies. In such cases, the Referring Schools may need to be informed about safeguarding the student's welfare.

At PASTways, if we have suspicions, cause for concern, direct information, or evidence that a child's physical, sexual, or emotional well-being is being harmed or neglected or is likely to be abused, we will take appropriate action per the procedures issued by the Sheffield Safeguarding Partnership.

As Such:

- We assert that all PASTways staff members (including volunteers and Board Members) are and feel an integral part of the Child Safeguarding Process.
- Accept that safeguarding children at the project is the responsibility of all staff, including volunteers and the board.
- We will ensure, through training and supervision, that all PASTways staff and volunteers know how to report concerns or suspicions and to whom to report them.
- The project has a Safeguarding Staff member with the knowledge and expertise to recognise and act on child protection concerns. To give advice and be responsible for coordinating

action within the project and liaising with schools and other agencies, where appropriate. **In all cases of Safeguarding / Child protection concerns involving Students at PASTways, the Designated Safeguarding Lead and Designated Deputy Safeguarding Lead are made aware of the situation.** Any further actions required, including the relevant or necessary sharing of such information, will be handled by the DSL/DSD.

- Safeguard the welfare of students whilst in PASTways through positive measures to address bullying, significantly where sexual, racial, or homophobic factors, disability or special educational needs, cyberbullying, or internet technologies aggravate this.
- Ensure that all staff know the Child Protection procedures established by the Sheffield Safeguarding Partnership and, where appropriate, the local authority and/or Central Government and act on any guidance or advice they give.
- We will ensure that all PASTways employees are suitable for working with children through our recruitment and selection of paid employees and volunteers.
- We will act swiftly and robustly to make appropriate referrals when a staff member is alleged to have committed an offence against a child.
- We will support students placed on or subject to a Child Protection or Child in Need Plan. This includes students who are Children Looked After (CLA) and Previously Looked After Children (PLAC) or adopted.
- Where students present with or are suffering anxiety around grief, this should be referred to the relevant member of support staff in the first instance.
- We will encourage all volunteers, including those from Sheffield Hallam University and Sheffield University, to complete the Sheffield Children's Safeguarding Online Training to enhance and support their development and enable them to understand the process better.

Terminology

Child: Please understand that our Safeguarding and Child Protection policies apply to all young people who are students at the setting. A child is anyone who has not yet reached their 18th birthday and is entitled to services or protection under the Children Act 1989.

Safeguarding: includes all that we do to ensure children are protected from abuse (in its many forms) and neglect.

Child Protection: This is the process of protecting individual children identified as either suffering or likely to suffer significant harm because of abuse or neglect. Social services will typically take the lead once a child has been identified as being at risk of harm. The legislation places responsibilities on school staff in the identification, prevention and management of child abuse and safeguarding children from harm.

Abuse: Child abuse is a form of maltreatment characterised by the infliction of harm or the failure to prevent harm upon a child. Such harm can encompass both physical and non-physical ill-treatment, including the repercussions of witnessing ill-treatment of others. This is particularly pertinent in the context of domestic abuse, wherein children may be adversely affected by exposure to its various

manifestations. Child abuse can occur within familial, institutional, or community settings, and may also manifest as online abuse or involve the utilisation of technology to facilitate offline maltreatment. Perpetrators of child abuse can include adults, other children, or individuals known to the child.

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

Emotional Abuse: The enduring emotional mistreatment of a child can lead to significant and adverse impacts on the child's emotional development. This form of maltreatment may involve conveying to a child that they are devoid of worth or affection, inadequate, or esteemed solely based on their fulfilment of another individual's needs. It may also encompass denying the child opportunities to articulate their perspectives, purposefully suppressing their voices, or ridiculing their expressions or means of communication. Moreover, it could entail the imposition of age-inappropriate or developmentally unsuitable expectations on children, engaging in interactions that surpass a child's developmental capacity, excessive safeguarding, restricting exploration and learning, or hindering the child from engaging in customary social interactions. Additionally, emotional abuse may encompass the act of witnessing or hearing the mistreatment of another, severe bullying (including cyberbullying) that frequently induces fear or peril in children or the exploitation or corruption of children. Notably, some degree of emotional abuse is present in all forms of child maltreatment, even when occurring in isolation.

Sexual Abuse: This is defined as abuse that involves forcing or enticing a child to take part in sexual activities, not necessarily involving violence, regardless of whether the child is aware of what is happening. This may involve physical contact, including assault by penetration, or non-penetrative acts, such as masturbation, kissing, rubbing, and touching outside of clothing. It may also include non-contact activities, such as involving children in looking at or in the

production of sexual images, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. People of any gender and age can perpetrate sexual abuse.

Neglect: This is defined as the persistent failure to meet a child's basic physical and/or psychological needs, which is likely to impair a child's health or development. This may involve a parent or carer failing to provide a child with adequate food, clothing, or shelter (including exclusion from home or abandonment); failing to protect a child from physical or emotional harm or danger; failing to ensure adequate supervision (including using inappropriate caregivers); or failing to provide access to appropriate medical care or treatment.

Safeguarding and Welfare of Children

PASTways is committed to ensuring that every child can be safe, healthy, and achieve their full potential. We recognise that safeguarding and promoting the welfare of children is everyone's responsibility, and we work in partnership with parents, carers, commissioning schools, local authorities, and other agencies to ensure that all learners receive the right support at the right time.

We believe every child has the right to:

Be safe and protected from abuse, neglect, exploitation, and harm.

Be listened to, respected, and treated with dignity.

Receive support that promotes their physical, emotional, mental, and educational wellbeing.

Access education in a safe, inclusive, and nurturing environment.

Develop resilience, confidence, independence, and positive relationships.

Achieve their individual potential regardless of their background, needs, or circumstances.

Our safeguarding practice is underpinned by the principles set out in Keeping Children Safe in Education (2025) and Working Together to Safeguard Children, ensuring that the welfare of the child is always paramount.

Conduct of staff.

All members of staff are required to always work professionally with children, especially when:

- Working alone with a child.
- Making physical interventions.
- Dealing with sensitive information.
- Giving and receiving gifts from children and parents.

PASTways staff should have no contact with any current or former pupils via mobile telephone (including texting) or through any social media, public, or private channels.

NOTE: The age definition of 'child' according to the 'Children Act 1989' is anyone who has not yet reached their 18th birthday.

Suppose any staff member has a reasonable suspicion that a child is suffering harm and fails to act following this policy and the Sheffield Safeguarding Partnership Procedures. In that case, this may be viewed as misconduct, and appropriate action may be taken.

Please Note....

When dealing with Safeguarding or Child Protection Concerns....

Please do Not Ask a Student for a Written Statement; it can interfere with a Police or Social Care Investigation.

You can make notes, which the Police or Social Care may request from you.

Police and Social Care Requests and Involvement

It is reasonable to expect occasional requests from the Police or Social Care for information or details concerning current students, former students, and their families. They may also request face-to-face conversations with students in PASTways.

These requests should be directed to and dealt with by the DSL or the DDSL on all occasions.

Allegations against members of staff.

If anyone alleges that a member of staff, including volunteers.

- Committed an offence against a child.
- Placed a child at risk of significant harm.
- Behaved in a way that questions their suitability to work with children.

Initially, the Manager will oversee the allegation. This will be discussed with the PASTways Chairperson and reported immediately to the Local Authority Designated Officer (LADO). The LADO will discuss the concerns and offer advice and guidance on managing the situation. Allegations made against the Manager are dealt with in the first instance by the Chair of the Board.

Dealing with Concerns.

If someone believes a child may be at risk of significant harm or suffering, they should follow PASTways procedures.

- All 'causes for concern' must be reported immediately to the **DSL** or the **DSD**, who will then decide and advise on the appropriate actions.
- Whatever the result, the incident will be logged and placed in a secure cabinet in the Manager's office, and then the relevant school will be informed.
- A cause for concern is being logged and updated with relevant details and any action taken.
- There will be regular, ongoing sharing of relevant information with the schools involved.
- If appropriate, other professionals, including pertinent external agencies, will be informed accordingly.

The procedure followed in the project relates to the DSL/DSD, following a concern.

If advice is to be sought from Social Care or the police, the DSL / DSD will inform the relevant schools and then immediately contact those professionals.

The DSL/DSD makes referrals to social care by contacting the relevant safeguarding/social care, duty advisers, or the police (in agreement with the referring schools).

All staff should be aware that they can make individual referrals themselves. For the relevant contact details, please see the DSD at PASTways. Please always ensure that the

DSL/DSD: Referring schools are informed when a referral is made.

Please ensure that you follow the guidelines in this policy if Social Workers or the Police request information about or wish to see a student at PASTways.

The DSL and DSD must complete a regular review of 'resolved' and 'unresolved' cases. This allows monitoring, reviewing, evaluating, and deciding on agreed-upon actions. All further involvement and documentation must be stored in this file and nowhere else. Files will be stored securely. All staff members should be familiar with the procedures for maintaining a confidential written record of

incidents, the Sheffield Safeguarding Partnership requirements, and the DFE document 'Keeping Children Safe in Education Part 1' (September 2022).

Searching, Screening and Confiscation.

As part of our school's search, screening, and confiscation policy, we aim to maintain a secure environment for all students and staff. The management team is authorised to conduct searches of students or their belongings if there are reasonable grounds to suspect the presence of prohibited items or any other items that violate the school's rules and policy. We adhere to government policy and other legislation to ensure compliance with our established guidelines and procedures.

Our school retains the right to subject students to screening using walk-through or handheld metal detectors. Trained personnel will conduct these screenings without physical contact, and students will be informed about the process as a safety measure. They will also receive a debriefing on using the detectors and can ask any necessary questions.

Confidentiality and Information Sharing.

All staff members at PASTways will ensure that all data about students is handled by the requirements of the law and any relevant national and local guidance.

Any low-level concerns are shared confidentially with the DSL and/or DSD. If unsure whether low-level concerns shared about a member of staff meet the harm threshold, the DSL will consult with their LADO. Low-level concerns will not be considered insignificant and will be shared responsibly. Staff and volunteers understand that low-level concerns can arise in several ways and know how to report concerns safely.

Any staff member with access to sensitive information about a child or the child's family must ensure that such information is shared **ONLY on a need-to-know basis**.

Regardless of the duty of confidentiality, if any staff member has reason to believe that a child may be suffering harm or be at risk of harm, they must forward this information without delay to the Designated member of staff (DSL / DSD) for Child Protection.

- We will share information with schools and other relevant agencies by agreed-upon procedures.
- We will cooperate with schools and other relevant agencies regarding safeguarding and child protection, including attending case conferences and meetings, as necessary.
- We will collaborate with schools and other agencies when completing an FCAF or other intervention paperwork. This will be discussed with students and their families. The documentation will be stored in the Manager's office.
- When documentation is required for a Case Conference, PASTways uses a secure e-mail system.

Referral / Safeguarding information.

The manager (DSL), Mrs P Booth, will hold a confidential, face-to-face meeting to receive relevant information on safeguarding, child protection, or other matters.

Online Safety

In line with Keeping Children Safe in Education (2025), our provision acknowledges the increasing safeguarding risks posed by online misinformation, disinformation, and the misuse of emerging technologies, including generative artificial intelligence (AI). We are committed to protecting all learners from online harms such as exposure to conspiracy theories, false narratives, and inappropriate AI-generated content. Our filtering and monitoring systems are reviewed regularly using the Department for Education's (DfE) "Plan Technology for Your School" self-assessment tool, ensuring that our digital infrastructure is robust, up to date, and fit for purpose. The updated guidance also emphasises cyber resilience and the safe, responsible use of AI technologies, which we incorporate into our wider safeguarding and digital literacy strategies. Where learners are dual-registered or attend off-site provision, we obtain written assurance that appropriate safeguarding checks have been completed on all staff. These arrangements are reviewed at least termly to ensure they remain safe, relevant, and aligned with the safeguarding expectations outlined by the DfE.

Safeguarding at PASTways.

- PASTways is dedicated to using inclusive, respectful language when referring to children and young people with special educational needs and/or disabilities (SEND). Following the SEND Code of Practice and Keeping Children Safe in Education (2025), we avoid clinical or deficit-based terms such as "disorder" or "spectrum" unless used within an appropriate diagnostic or medical context. Our policy language reflects a person-centred, strengths-based approach, recognising the individuality, dignity, and capabilities of each learner.
- We will address child protection concerns and ensure that children attending the project are kept safe from harm while in our care.
- • Bullying: The project will also ensure that bullying is recognised and addressed so that any harm caused by other students can be minimised. Bullying can take many forms, including sexualised behaviour, homophobic bullying, racist behaviour, cyberbullying, or situations that may be linked to domestic abuse in the family home.
- Safe Recruitment and code of conduct for staff, including a Supervision and Induction Policy
- Confidentiality
- Behaviour and Discipline
- Health and Safety
- Physical restraint
- Online Safety
- CSE /CRE/CCE, County Lines
- Prevent Radicalisation and extremism.
- FGM (Female Genital Mutilation)
- HBV (Honour Based Violence)

- FM (Forced Marriage)
- Child Abuse
- CME Children Missing from Education, guided by the [Police](#) document

Low-Level Concerns Policy

In accordance with Keeping Children Safe in Education (KCSIE 2025), PASTways recognises the importance of creating a culture where all concerns about adults working with children are shared responsibly and recorded appropriately.

A low-level concern does not mean that a person has behaved in a way that meets the harm threshold; however, it may indicate behaviour that is inconsistent with the staff code of conduct or professional boundaries.

Promoting an open, transparent safeguarding culture helps identify concerning patterns of behaviour at an early stage and supports both staff and learners.

Reporting Low-Level Concerns

All staff, volunteers, supply staff, contractors, and directors have a responsibility to report low-level concerns promptly.

Low-level concerns should be reported to:

The Designated Safeguarding Lead (DSL)

or

The Chair of Directors if the concern relates to the Manager/DSL.

Staff are encouraged to report concerns about:

- their own behaviour (self-reporting); or
- the behaviour of colleagues.

PASTways promotes a **no-blame culture**, recognising that early sharing of concerns strengthens safeguarding practice.

Recording and Secure Storage

The DSL will:

- record all low-level concerns in writing;
- include details of the concern, context, actions taken, and outcome;
- maintain a confidential Low-Level Concerns Log separate from child protection records;
- store records securely in accordance with data protection legislation.

Records will be retained in line with safeguarding record retention guidance.

Monitoring and Pattern Identification

The Designated Safeguarding Lead will:

- review low-level concerns regularly;
- monitor for emerging patterns of behaviour;
- take appropriate action where concerns accumulate or escalate;
- seek advice from the Local Authority Designated Officer (LADO) where necessary.

Where a pattern of behaviour suggests risk of harm, the concern will be managed under formal allegations procedures.

Staff Awareness and Training

All staff will:

- receive training on recognising and reporting low-level concerns;
- understand professional boundaries;
- read and sign the Staff Code of Conduct annually;
- understand that safeguarding is everyone's responsibility.

Confidentiality and Professional Support

Low-level concerns will be handled sensitively and fairly.

PASTways will:

- protect staff from malicious or unsubstantiated allegations.
- provide appropriate support where concerns are raised;
- ensure confidentiality is maintained wherever possible.

Other legislation and guidance

This policy is underpinned and written with the following guidance:

- Keeping Children Safe in Education (2025)
- Working together to safeguard children.
- Human Rights Act 1998.
- Equality Act 2010.
- Data Protection Act 2018
- The arrangements agreed and published by our three local safeguarding partners.
- Section 175 of the Education Act 2002
- The DfE Staffing and Employment Advice for school, which relates to The School

Staffing (England) Regulations 2009

- The Children Act 1989 (and 2004 amendment)

- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74.

of the Serious Crime Act 2015 and Statutory guidance on FGM

- The Rehabilitation of Offenders Act 1974
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006
- Statutory guidance on the Prevent duty.
- Statutory framework for the Early Years Foundation Stage
- KCSIE now applies to providers of post-sixteen education, including sixth-form colleges, as set out in the Education and Training (Welfare of Children) Act 2021.
- Disqualification under the Childcare Act 2006
- Part 3 of the schedule of the Education (Independent School Standards) Regulations 2014

New Staff/Volunteers Recruitment and Training

All new staff receive induction training covering Safeguarding and Child Protection.

All staff are provided with access to the Department for Education (DfE) guidance *Keeping Children Safe in Education* (Part One) and must ensure they remain fully familiar with and up to date with its contents. Staff are required to read and understand this document alongside the alternative provision setting Safeguarding Policy, which is also included within this document.

Staff are required to undertake training at least annually, alongside DSL training every 2 years. We also provide regular safeguarding updates during the year.

The full SSCB (Sheffield Safeguarding Children's Board) Policy is also valuable and informative.

Recruitment

PASTways uses and follows the up-to-date guidance (Keeping Children Safe in Education 2025) concerning the recruiting of staff and volunteers at the project, the completion of all necessary checks before a person takes up a position at the project and when a candidate is shortlisted, they must complete a self-declaration of any criminal record or information.

- Identity checks and character references to be sought.
- Academic qualifications, making sure they are genuine.
- Previous employment history is to be examined, and any gaps are to be accounted for.
- DBS checks.

Volunteers.

- The project will provide safeguarding training to all new volunteers, enabling them to fulfil their child protection responsibilities effectively.
- All staff and volunteers are encouraged to attend safeguarding training. If staff cannot access face-to-face training, the alternative provision expects them to complete online training

using the Sheffield Safeguarding Partnership website (this is aimed at Sheffield Hallam and Sheffield University students who have PASTways as their placement).

Children Missing from Education

Education has established standard practices and procedures to support projects, staff, and other authorities when children are missing from Educational Settings. At PASTways, we will follow these standard procedures accordingly. As with all concerns for young people, our safeguarding procedures, which ensure the safety and well-being of our students, will be uppermost.

A child who repeatedly goes missing from education can be a warning sign of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or such issues as mental health problems, substance abuse, radicalisation, FGM or forced marriage. There are many circumstances where a child may become missing from education, but some.

Children are particularly at risk. These include children who:

- Are at risk of harm or neglect.
- Are at risk of forced marriage or FGM.
- Come from Gypsy, Roma, or Traveller families.
- Come from new migrant families.
- Come from the families of service personnel.
- Go missing/run away from home or care.
- Are supervised by the youth justice system.
- Cease to attend school.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from PASTways, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the referring school and the (AP) Alternative Provider network.

Child Sexual Exploitation (CSE) & Children at Risk of Exploitation (CRE)

Recently, the problematic issue of Child Sexual Exploitation has been at the forefront of several published reports. CSE is also at the higher end of the agenda regarding Safeguarding and Child Protection.

The response to any concerns about CSE involving any student at PASTways is of paramount importance.

The project's DSL and DSD will lead in all CSE cases where concerns are raised about a student or students. All staff should know and be clear on who the lead persons are at the project for matters related to CSE.

All staff should be aware of the CSE indicators.

As with any Safeguarding concern, all matters related to CSE & CRE will be logged, documented, and stored securely in the Manager's Office, and reports will be provided to the relevant schools.

CSE is defined as a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity for any of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage, increased status or other advantage of the perpetrator or facilitator
- Through violence or the threat of violence
- We recognise this is relevant to both boys and girls. Risk factors may include going missing, staying out unusually late
- Engagement in offending
- Disengagement from education
- Using drugs or alcohol
- Unexplained gifts/money
- Overly secretive
- Repeat concerns about sexual health.
- A decline in emotional well-being
- Association with gangs
- Unexplained injuries
- Carrying weapons, access to or carrying an unusual number of mobile phones

Child Criminal Exploitation (CCE), County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a 'typical' feature of county lines criminal activity. Drug networks or gangs groom and exploit children and young people to carry drugs and money from one area to another. Victims are typically trafficked for this criminality.

PASTways will address any concerns and report them to the relevant authorities immediately.

The **DSL** will lead in such instances or where concerns are raised.

Children and young people involved with gangs and criminal exploitation need help and support. This can include those involved in serious violent crimes. They might be victims of violence or pressured into doing things like stealing, carrying drugs or weapons. They might be abused, exploited, and put into dangerous situations.

Child criminal exploitation is defined as a form of abuse.

Where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity for any of the following.

Reasons: In exchange for something the victim needs or wants. For the financial advantage or other advantage of the perpetrator or facilitator. Through violence or the threat of violence, **County lines** refer to gangs and organised criminal networks exploiting children to move, store or sell drugs and money in one or more areas, locally or across the UK.

Signs which may indicate criminal exploitation:

- Persistently going missing from school or home and or being found out-of-area.
- Unexplained money, clothes, or mobile phones or unexplained injuries
- Excessive texts, phone calls
- Relationships with controlling, older individuals or groups or changes in relationships
- Leaving home, care without explanation
- Suspicion of physical assault, unexplained injuries
- Parental concerns
- Carrying weapons

Prevent – Radicalisation / Extremism.

The latest government legislation places mandatory requirements on schools and other educational establishments to be proactive and have a policy to deal with the possibility of any student becoming radicalised into any extreme group.

Prevent Duties

Extremism refers to vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and the mutual respect and tolerance of different faiths and beliefs. Extremism also includes calling for the death of members of the armed forces. Radicalisation describes the process by which a person comes to support terrorism and extremist ideologies linked to terrorist groups. The alternative provision setting will ensure that all staff, including governors and volunteers, are aware of extremism, recognise its signs, and are alert to concerning behaviours and ideologies that are considered extreme. They need to understand the British Values agenda and follow their duties in the Prevent Guidance 2015 to prevent radicalisation.

The Manager or Deputy will:

- Establish existing mechanisms for understanding the risk of extremism.
- Ensure staff understand the risks associated with addressing issues that arise from delivering regular training and updates.
- Provide appropriate and sufficient training on the Prevent duty.
- Ensure all staff (including governors and volunteers) implement the duty.

- The project will respond to any concern about Prevent as a safeguarding concern and will report in line with the setting safeguarding reporting procedures. This may include a referral into the Channel using the case pathway process.
- We will seek to work in partnership, undertaking risk assessments where appropriate and proportionate to risk, building our children's resilience to radicalisation.
- We will use the relevant forms to record any concerns, keeping records that will be treated as Child Protection Records and storing them according to the appropriate guidelines.

In line with the updates to *Keeping Children Safe in Education* (2025), the statutory responsibilities of the management team have been extended to include promoting the educational attainment of children in kinship care. This extension, effective from September 2024, reflects a strengthened focus on ensuring that all children in care—including those placed with family or friends—receive appropriate support and oversight. As an Alternative Provision setting, PASTways will collaborate closely with Virtual School Heads to support the educational progress and safeguarding of learners in kinship care, ensuring their needs are met effectively and their welfare prioritised.

FGM – Female Genital Mutilation, HBA – Honour-Based Abuse

'Honour-based' abuse (HBA) includes incidents or crimes committed to protect or uphold the honour of the family and/or community, such as FGM, forced marriage, and practices like breast ironing. Abuse in this context often involves a broader network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff are concerned, they will speak to the DSL, activating local safeguarding procedures.

Female Genital Mutilation (FGM)

FGM comprises all procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons." (World Health Organisation, 2016) FGM has been an embedded practice for centuries in some countries in the world, including Africa, the Middle East, Iran, Iraq, Oman, the United Arab Emirates, the Occupied Palestinian Territories, India, Indonesia, Malaysia and Pakistan (DH, 2015). The World Health Organisation estimated that between 100 and 140 million women and girls worldwide have undergone FGM. Still, the prevalence of FGM in the UK is difficult to assess because of the hidden nature of the crime.

All suspected or actual cases of FGM are a safeguarding concern, and safeguarding procedures will be followed. This will include a referral to the police. If any staff member is concerned about a pupil, they will refer the concern to the Designated Safeguarding Lead (s) within the setting before reporting it directly to the Police. It is a mandatory reporting duty for all staff to directly report to the police when it is believed an act of FGM has been carried out on a girl under eighteen in the UK. Failure to do so may result in disciplinary action being taken against you.

There are four types of FGM, mainly carried out on girls between the ages of five and ten.

In some countries, it is practised on babies as young as two or three days old and in other areas, it is practised before marriage or as part of the wedding rituals.

It is the parents' decision as to whether their daughters are 'cut', but they face tremendous pressure.

Pressure from older family members, especially if they return to their country of origin. In most countries, including the UK, FGM is illegal.

Signs may include:

- Being repeatedly absent from school or absent for a prolonged period.
- Not participating in Physical Education
- Unauthorised and or extended leave, vague explanations or plans for removal of a female in a high-risk category (parents from a country who are known to practice FGM), especially over the summer period.
- Plans to take a holiday which may be unauthorised, unexplained, or extended in a country known to practice FGM.
- Having difficulty walking, sitting, or standing, or looking uncomfortable
- Finding it hard to sit still for long periods (where this was not a problem previously)
- Spending longer than usual in the bathroom or toilet due to difficulties urinating
- having frequent urinary, menstrual or stomach problems
- Demonstrating increased emotional and psychological needs – for example, withdrawal, depression, or significant behaviour change. I am reluctant to undergo any medical examination.

FM – Forced Marriage

FM is a specific offence under Section 121 of the Anti-Social Behaviour, Crime and Policing Act 2014.

Should any concerns or indications arise that indicate FM, the DSL/DSD must be informed. The appropriate action will be taken, and Safeguarding and Child Protection procedures will be followed accordingly.

HBV is an abuse of human rights. Specific offences are committed. As with FGM (see above), should there be any concerns or indications for any of our students who are or may be at risk of HBV or any other form of domestic violence, the project will take the appropriate action as required. As with all our Child Protection concerns, procedures will be followed accordingly.

The DSL will speak to the pupil about the concerns in a secure and private place. The local safeguarding procedures are followed, and the case is referred to the designated local authorities. Officer, seek advice from the Forced Marriage Unit on 020 7008 0151 or fmunit@fco.gov.uk, refer the pupil to a class teacher, learning mentor, or member of the team as appropriate.

Child Abuse

Child-on-child abuse is behaviour by an individual or group intending to physically, sexually, or emotionally hurt others. We recognise that being subject to harassment, violence and/or abuse may

breach a child's rights, as set out in the Human Rights Act. We recognise That Child abuse can take many forms:

- Bullying, including cyberbullying.
- Up-skirting.
- Gender-based violence.
- Sexual assaults and sexting.
- The sending of indecent images from one person to another through Digital Media Devices

PASTways recognises this as a safeguarding concern for all our children.

There are examples of children of all ages sending and receiving indecent images through digital media.

There is a growing use of social media across projects. Children must be supported if they are exposed to such images.

In the event of a safeguarding concern, we will seek advice from relevant agencies and professionals, acknowledging that we must adhere to both national and local guidelines. We will respond by working closely with parents and carers.

We will teach children about this aspect of safeguarding through online safety lessons. These are linked to online safety policies and the PHSE curriculum.

Always take the complaint seriously.

Photographing Children.

- PASTways will not allow others to photograph or film children during a project activity without parental permission.
- We will not use images of students on the PASTways website, in publicity, or in press releases without obtaining consent from their parents.

Physical contact and restraint.

Staff may need to physically intervene with children; this will only be done following the project's policy. Certain staff members will have completed relevant training regarding the 'Restraint' of pupils (Team Teach).

Wherever possible, trained staff should be utilised.

This does not preclude any other staff members from intervening in given situations where necessary.

Sexual Violence and Sexual Harassment

Sexual violence includes rape, assault by penetration and sexual assault. Sexual violence may consist of an online element which threatens/encourages or facilitates sexual violence. Sexual violence and sexual harassment can occur between two or more children of any age and can happen both physically and/or verbally. PASTways is aware that sexual violence and sexual assault can happen

both inside and outside of PASTways. Sexual violence and sexual harassment are never acceptable in any form, and we make it clear to staff and students that there is a **zero-tolerance** policy.

The project has a clear set of values and expectations that are demonstrated to students and upheld through regular sessions of Personal, Social, and Health Education (PSHE). The sessions are age-appropriate and developed to be fully inclusive to all students. The sessions will tackle:

- Healthy relationships
- Boundaries and consent
- Stereotyping, prejudice, and equality
- Self-Esteem
- How to recognise abusive, coercive, and controlling relationships and behaviours
- The concepts of law relating to sexual consent, sexual exploitation, sexual violence, and sexual harassment.

Responding to signs, reports, and concerns

- Staff are aware that even though there may be no reports of sexual harassment or sexual violence, it may still be occurring.
- Staff will challenge physical behaviour such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting skirts.
- Staff will challenge any verbal behaviour, such as catcalling, sexual jokes, or sexual comments.
- All reports of Sexual violence and sexual assault will be reassured that they are being taken seriously and that they will be supported and kept safe.
- Where possible, reports will be managed by the DSL and another staff member. In most cases, this will be the DSD.
- Staff should never promise confidentiality, as it is likely the report will need to be shared in the best interests of the victim.
- When a report of sexual violence or sexual harassment is made, the wishes of the victim should always be considered, especially regarding decisions about how investigations will progress and the support they are offered. This will balance our duty to protect other students and the victim.
- All concerns and reports will be recorded, as well as decisions and their reasons.
- PASTways will do its best to protect the victim(s) and alleged perpetrator(s) from bullying or harassment, both face-to-face and online.

Additional Information

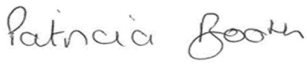
It is crucial to be aware that mental health problems can be an indicator that a child has suffered or is at risk of abuse, neglect, or exploitation. If you do have any concerns about a child's mental health, you must report this to the DSL.

All staff to be aware of the indicators to signal children are at risk or involved in crime, which can include increased absence from school, change in friendship, signs of self-harm, change in well-being, signs of assault, unexplained gifts, or being seen to be associated with criminal networks.

Being homeless or at risk of becoming homeless presents a danger to a child's welfare. The DSL should be aware of the contact details and routes to the Local Housing Authority (LHA). Indicators of a family at risk are household debt, rent arrears, domestic abuse, antisocial behaviour, and the family being asked to leave their property. If you are to be informed of this information, it must be passed on to the DSL.

It is essential that everybody working in a setting understands their safeguarding responsibilities.

PASTways recognises that mental health difficulties can be both an indicator of safeguarding concerns and a consequence of abuse, neglect, exploitation, or trauma. Staff understand that children experiencing mental health challenges may be vulnerable to harm and must report any concerns immediately to the Designated Safeguarding Lead (DSL), who will consider appropriate safeguarding action alongside pastoral or external support.

Signed..... 

Manager

Dated ... 1st September 26