

# PACE Northwest - Safeguarding Policy

Alternative Education Provider · Liverpool, England

**Approved by:** Board of Directors

**Policy owner:** Designated Safeguarding Lead (DSL) - Rebecca Hambleton

**Effective date:** 29 August 2025

**Reviewed:** 16 September 2026

**Next review due:** 16 September 2027 (or sooner if legislation, statutory guidance or organisational arrangements change)

**Safeguarding contact:** becs@pace-com.org · **Emergency:** 999

## 1. Purpose

PACE Northwest is committed to safeguarding and promoting the welfare of all learners and apprentices. We recognise our responsibilities to protect children under 18 and to respond appropriately where adults may be at risk of abuse or neglect.

This policy establishes PACE Northwest's safeguarding framework for prevention, early identification, reporting, information sharing, referral, multi-agency working and support. The welfare and best interests of the child or learner are central to decision-making.

## 2. Scope

This policy applies to:

- all learners and apprentices, including those learning online, in workplaces, on placements or on external visits;
- all staff, directors, volunteers, agency/supply workers, contractors and partners; and
- visitors and employers where their activities bring them into contact with PACE Northwest learners.

## 3. Legal and statutory framework

PACE Northwest will follow applicable legislation and statutory guidance, including:

- Children Act 1989 and Children Act 2004.
- Education Act 2002, sections 157/175 where applicable.
- Children and Families Act 2014.
- Children and Social Work Act 2017.
- Working Together to Safeguard Children 2026.
- Keeping Children Safe in Education (KCSIE) 2026 where applicable to PACE Northwest's setting and activities.
- Current statutory Information Sharing guidance for safeguarding children and young people, including relevant requirements coming into force from 30 September 2026.
- Counter-Terrorism and Security Act 2015 and current Prevent duty guidance.
- Care Act 2014 in relation to adults with care and support needs who may be at risk of abuse or neglect.
- Equality Act 2010.
- UK GDPR and Data Protection Act 2018, as amended.
- Current DfE alternative provision and safeguarding guidance, local safeguarding partnership procedures and relevant Ofsted inspection requirements.

## 4. Safeguarding principles

PACE Northwest will:

- provide a safe learning and working environment and promote a culture in which safeguarding is everyone's responsibility;
- listen to learners and take their views, wishes, feelings and lived experience seriously;
- act promptly on concerns and avoid requiring certainty or proof before concerns are shared;
- practise in an inclusive, anti-discriminatory and anti-racist way and recognise barriers that may make it harder for some learners to disclose harm;
- work collaboratively with statutory agencies and safeguarding partners;
- ensure safeguarding decisions are properly recorded, reviewed and based on the information available; and

- ensure learners know how to seek help and that staff know how to respond.

## 5. Safeguarding responsibilities

- **Board of Directors:** has overall governance responsibility, approves safeguarding arrangements, receives appropriate safeguarding assurance and ensures sufficient resources.
- **Designated Safeguarding Lead (DSL) - Rebecca Hambleton:** leads safeguarding practice and case management, supports staff, maintains appropriate records, makes/refers decisions, liaises with statutory agencies and oversees training.
- **Deputy DSL(s):** support the DSL and act in their absence. Ultimate lead responsibility remains with the DSL.
- **All staff:** must understand their safeguarding responsibilities, complete required training, remain professionally curious and report concerns without delay.
- **Employers/partners:** must cooperate with PACE Northwest safeguarding arrangements and report concerns involving learners promptly.
- **Learners:** are encouraged to report concerns affecting themselves or others through any trusted member of staff or the safeguarding contact.

## 6. Staff safeguarding knowledge and training

Staff working with children must read and understand the safeguarding information required for their role, including the relevant parts of KCSIE 2026 where applicable. Safeguarding and Prevent information will be provided at induction and updated regularly, with formal refresher training at appropriate intervals.

The DSL and deputies will undertake role-specific safeguarding training at least every two years and refresh their knowledge and skills regularly between formal training. Additional training will be provided according to role and risk, including online safety, exploitation, SEND, looked-after children, domestic abuse and mental health where relevant.

## 7. Types of abuse, neglect and safeguarding concerns

Staff must be alert to indicators of harm, including:

- physical, emotional and sexual abuse and neglect;
- child sexual exploitation (CSE) and child criminal exploitation (CCE), including county lines;
- domestic abuse, including the impact on children who see, hear or experience its effects;
- child-on-child abuse, sexual violence and sexual harassment;
- bullying, prejudice-based/discriminatory bullying and online abuse;
- serious violence, gangs, weapons and criminal exploitation;
- trafficking, modern slavery and missing episodes;
- female genital mutilation (FGM), forced marriage and other forms of so-called honour-based abuse;
- radicalisation and extremism;
- online grooming, coercion, sexual extortion, harmful content and technology-assisted abuse;
- mental-health concerns where these may indicate or contribute to safeguarding risk; and
- abuse or neglect affecting adults with care and support needs.

## 8. Child-on-child abuse

PACE Northwest recognises that children can abuse other children and that this can occur inside or outside the setting and online. It will never be dismissed as 'banter', 'just having a laugh', 'part of growing up' or similar.

Concerns may include bullying, sexual harassment, sexual violence, abuse within intimate relationships, physical abuse, initiation/hazing, consensual or non-consensual sharing of nude/semi-nude images, upskirting and technology-assisted abuse.

Victims will be taken seriously, supported and protected from victim-blaming. The DSL will consider the needs and safety of the victim, the alleged perpetrator(s) and other children, including whether referrals to children's social care or police are required.

## **9. Reporting safeguarding concerns**

Any safeguarding concern must be reported to the DSL or deputy without delay by speaking directly to them and/or using PACE Northwest's agreed reporting route at [becs@pace-com.org](mailto:becs@pace-com.org). Staff should record what they have seen, heard or been told accurately and promptly.

If a child is in immediate danger or at risk of immediate serious harm, call 999. A referral to children's social care may also be required.

If the DSL/deputy is unavailable, staff must not delay appropriate action. Anyone can make a referral to children's social care where necessary. Staff should follow up concerns if they do not believe appropriate action has been taken.

## **10. Responding to a disclosure**

When a learner discloses abuse or harm, staff should:

- listen calmly and take the disclosure seriously;
- avoid leading questions, promises of secrecy or unnecessary investigation;
- explain that relevant information may need to be shared to keep them or others safe;
- record the learner's own words as accurately as possible, together with relevant context; and
- report immediately to the DSL/deputy and follow their safeguarding instructions.

## **11. Information sharing and confidentiality**

Safeguarding information will be shared lawfully, proportionately and on a need-to-know basis. Data-protection law is not a barrier to appropriate safeguarding information sharing.

Staff should normally involve children and families in information-sharing decisions where safe and appropriate, but consent is not always required. Information may be shared without consent where there is a lawful basis and this is necessary to safeguard a child or another person.

PACE Northwest will follow current statutory information-sharing guidance, including applicable duties taking effect from 30 September 2026. Decisions to share or not share significant information, and the reasons for them, should be recorded.

## **12. Referrals and multi-agency working**

The DSL will assess concerns and make referrals or seek advice from the appropriate agency, which may include local-authority children's social care, adult safeguarding, police, LADO, Prevent/Channel or health services.

PACE Northwest will cooperate with safeguarding partners, social workers, commissioning schools, Virtual School Heads, local authorities, employers and other agencies as appropriate. Staff will provide relevant information promptly and participate in strategy discussions, assessments or meetings where required.

## **13. Early help and Family Help**

Where concerns do not require immediate statutory intervention but a learner or family would benefit from additional support, PACE Northwest will consider appropriate early or Family Help arrangements in line with current local and national safeguarding guidance.

Staff should be alert to emerging needs and raise them with the DSL. Support should be coordinated with the learner and relevant professionals and escalated if risks increase or support is not effective.

## **14. Safeguarding learners with additional vulnerabilities**

Some learners may face additional barriers to recognising or reporting abuse, including those with SEND, communication needs, care experience, unstable accommodation, mental-health difficulties, English as an additional language or experiences of discrimination.

Staff must avoid assuming that changes in behaviour, distress or injury are explained by disability or existing needs. Reasonable adjustments should be made to enable learners to communicate concerns and participate in safeguarding decisions.

## **15. Looked-after children and care leavers**

PACE Northwest will work with Virtual School Heads, social workers, personal advisers, carers and commissioning organisations as appropriate to support looked-after and care-experienced learners. Staff should understand that care experience may create additional vulnerabilities but should not make assumptions about individual risk.

Relevant arrangements are set out in the Looked After Children & Care Leavers Policy.

## **16. Online safety**

Online safety is integral to safeguarding. PACE Northwest will maintain appropriate policies and controls for IT use, remote delivery and digital communications and will educate learners about online risk.

Staff should be alert to grooming, exploitation, radicalisation, sexual extortion, image-based abuse, harmful content, impersonation, cyberbullying and inappropriate contact. PACE Northwest will use proportionate filtering and monitoring arrangements where applicable and ensure responsibilities for reviewing these arrangements are clear.

## **17. Prevent duty**

PACE Northwest will have due regard to the need to prevent people from being drawn into terrorism where the Prevent duty applies. Staff will receive appropriate Prevent awareness training and report concerns through the safeguarding route.

The DSL will consider whether advice, local Prevent support or a Channel referral is appropriate. Prevent concerns will be considered alongside the learner's wider safeguarding and welfare needs.

## **18. Safer recruitment**

PACE Northwest will apply safer-recruitment practices appropriate to the roles and regulated activity involved. This includes appropriate identity, employment-history, reference, right-to-work, qualification and criminal-record checks and any other checks required by current safeguarding guidance.

At least one appropriately trained person should be involved in relevant recruitment processes. Recruitment decisions and checks will be recorded securely. Where PACE Northwest is required to maintain a Single Central Record or equivalent record of checks, it will do so in accordance with applicable requirements.

## **19. Allegations and low-level concerns about adults**

Concerns about adults working with children must be reported promptly and handled under PACE Northwest's allegations and low-level-concerns arrangements.

Where an allegation may meet the harm threshold, it must be escalated to the appropriate senior safeguarding lead and the LADO process followed without delay. Low-level concerns that do not meet the harm threshold must still be recorded, reviewed and considered for patterns.

Concerns about the DSL or senior safeguarding lead must be escalated through the alternative senior/governance route specified in PACE Northwest's Reporting Low-Level Concerns Policy and relevant allegations procedure.

## **20. Safeguarding in alternative provision, workplaces and off-site settings**

Where learners attend alternative provision, work placements, employer premises or other off-site settings, PACE Northwest will take proportionate steps to understand and assure itself of relevant safeguarding arrangements, clarify responsibilities and maintain appropriate communication.

Placement or commissioning arrangements do not remove PACE Northwest's responsibility to act on safeguarding concerns that come to its attention. Concerns involving another provider or employer will be shared promptly with the relevant safeguarding lead and statutory agencies where required.

## **21. Adult safeguarding**

Where an adult learner has care and support needs and is experiencing, or is at risk of, abuse or neglect and is unable to protect themselves because of those needs, PACE Northwest will follow the Care Act 2014 safeguarding framework and relevant local adult-safeguarding procedures.

Immediate danger should be reported to emergency services. Other concerns should be raised with the DSL, who will consider referral to the relevant local-authority adult safeguarding service or other agency.

## **22. Record-keeping**

Safeguarding records will be accurate, timely, confidential and stored securely with appropriate access controls. Records should distinguish fact, professional opinion and third-party information and include decisions, actions, referrals and outcomes.

Child-protection records will be retained and transferred in accordance with applicable statutory guidance, local arrangements and PACE Northwest's retention schedule. Safeguarding records will normally be kept separately from routine learner records.

## **23. Whistleblowing and escalation**

Staff must be able to raise concerns about unsafe practice or failures in safeguarding. Internal concerns can be raised through PACE Northwest's Whistleblowing Policy.

If staff believe safeguarding concerns are not being addressed appropriately, they should escalate them through senior leadership/governance and, where necessary, to the relevant external safeguarding body. The NSPCC Whistleblowing Advice Line may also be used for concerns about child-protection practice.

## **24. Learner safeguarding awareness and support**

PACE Northwest will ensure learners know who they can speak to if they feel unsafe or are worried about someone else. Safeguarding information will be communicated in ways appropriate to age, need and communication ability.

Learners will have access to pastoral/welfare support and appropriate referral or signposting to specialist services. Curriculum and learner-support activity will promote healthy relationships, online safety, equality, resilience and understanding of risk.

## **25. Monitoring, assurance and review**

The DSL will monitor safeguarding practice and relevant trends throughout the year and provide appropriate reports to senior leadership and the Board. Governance oversight will include training, referrals, themes, safer recruitment, allegations/low-level concerns, online safety and improvement actions while protecting individual confidentiality.

This policy will be reviewed at least annually and sooner following significant legislative or statutory-guidance change, a serious safeguarding incident, material change to provision or evidence that arrangements require improvement.

## **26. Related policies**

- Prevent Duty Policy.
- Reporting Low-Level Concerns Policy.
- Staff Code of Conduct and safer-recruitment arrangements.
- Equality, Diversity & Inclusion Policy.
- Health, Safety & Welfare Policy.
- Learner Support including SEND Policy.
- Looked After Children & Care Leavers Policy.
- Behaviour, Anti-Bullying, Anti-Racism and Discriminatory Bullying policies.
- Data Protection Policy.
- Customer Service Charter & Complaints Procedure.
- Emergency Lockdown Procedures.

## **27. Contact**

**DSL:** Rebecca Hambleton

**Safeguarding contact:** becs@pace-com.org

**Emergency:** dial 999 where there is immediate danger.

## **Version control**

v1.1 - reviewed 16 September 2026.