



PATHWAYX

PROFESSIONAL CODE OF CONDUCT

For directors, employees, contractors, volunteers, associates and authorised representatives

Legal entity	PathwayX Ltd
Company number	NI742566
Registered office	8 Grange Road Lane, Dundonald, Belfast, BT16 1GH
Policy owner	Ben Glasgow, Founder & Director
Version and issue date	Version 1.0 - 4 August 2026
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The standard: Act professionally, protect children, maintain clear boundaries, use information responsibly and report anything that may place a person or PathwayX at risk. When uncertain, choose the safer and more transparent course and seek advice.

FINAL - ADOPTED AND SIGNED; PERSONNEL ACKNOWLEDGEMENT REQUIRED

Read with the Child Protection & Safeguarding Policy, Data Protection & UK GDPR Policy, Complaints Policy and applicable host procedures.



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Urgent safety concern: If there is immediate danger, serious injury or a crime in progress, call 999. Otherwise report a child-safety concern the same day under the PathwayX Child Protection & Safeguarding Policy and the host organisation's procedure. A concern about the Director/DSL must bypass him.



Quick conduct guide

Every person representing PathwayX must be able to apply these standards without waiting to reread the full Code. These rules are minimums; a host school or client may impose stricter arrangements.

Always

- put a child's safety, welfare, dignity and best interests before convenience, reputation or commercial pressure;
- work in authorised, observable and appropriately supervised settings;
- use approved professional accounts, platforms, devices and records;
- keep language, humour, examples and contact appropriate to the person's age, needs and the service purpose;
- declare conflicts, gifts, mistakes and accidental boundary crossings promptly;
- preserve relevant information and report concerns through the correct route; and
- cooperate with schools, parents/guardians, safeguarding professionals and lawful investigations while respecting confidentiality.

Never

- develop or pursue a sexual, romantic, exploitative or secret relationship with a child, including a 16- or 17-year-old;
- use personal social media, disappearing messages or an undisclosed private channel to contact a child;
- humiliate, threaten, discriminate against, groom, favour, intimidate or retaliate against anyone;
- complete, submit or dishonestly improve an applicant's work, sit an assessment for them or help them misrepresent experience;
- photograph, record, transport or visit a child outside the authorised procedure;
- attend delivery impaired, provide alcohol, nicotine, drugs or gambling products, or use them around children; or
- promise secrecy, suppress a concern, investigate abuse yourself or delay a safeguarding report to protect PathwayX or another person.

If something goes wrong: Protect immediate safety, stop the unsafe activity where reasonable, record the facts and report promptly to Ben Glasgow, Designated Safeguarding Lead or the appropriate lead. If the concern involves the Director/DSL, use the host safeguarding lead, HSC Trust Gateway Service and/or PSNI route instead.



Document control and approval

Control	Current position
Policy owner	Ben Glasgow, Founder & Director
Safeguarding lead	Ben Glasgow, Designated Safeguarding Lead
Status	Final - adopted and signed; acknowledgement required before unsupervised or direct service activity.
Issue / review	31 July 2026 / no later than 4 August 2027
Early review triggers	Serious incident, allegation, repeated concern, legal or guidance change, insurer requirement, new technology/service or evidence that a control is ineffective.

1. Purpose and status

This Code defines the behaviour expected from anyone acting for PathwayX Ltd. Its purpose is to protect children and adults, preserve trust, support consistent professional delivery and make unsafe or unethical conduct easier to recognise and report. It forms part of induction, supervision and the conditions on which a person is authorised to represent PathwayX, subject to their contract and legal status.

Minimum standard: Compliance with this Code does not replace professional judgement, law, a contract, the PathwayX safeguarding policy or a host organisation's rules. Where requirements differ, follow the higher lawful safeguarding standard and notify the responsible PathwayX lead.

2. Scope and individual responsibility

The Code applies to:

- directors, employees, workers, contractors, consultants, volunteers, interns and associates;
- guest speakers, facilitators, photographers and other authorised representatives where the relevant clauses are incorporated into their briefing or agreement;
- PathwayX One, PathwayX Schools, PathwayX Reach, events, online activity, travel and administration; and
- work-related conduct outside scheduled delivery, including online or private conduct, only where it may reasonably affect child safety, role suitability, confidentiality, legal duties, client trust or PathwayX's legitimate reputation.

Each person is responsible for understanding the rules relevant to their role, asking before acting when unsure, completing required training and reporting their own mistakes. A direction from a client, colleague or senior person is not authority to act unlawfully or unsafely.



3. Core principles and responsibilities

- **Safety first.** Act on risk promptly. Do not wait for proof before passing a reasonable safeguarding concern to the correct person.
- **Professional boundaries.** Keep relationships purposeful, transparent and consistent with the service role; never use access to a young person for personal, emotional, sexual, financial or social benefit.
- **Dignity and fairness.** Treat people respectfully, listen to their views and avoid discrimination, humiliation, favouritism, harassment or retaliation.
- **Integrity.** Be honest about qualifications, services, evidence, outcomes, expenses and conflicts. Do not mislead a participant, school, employer or regulator.
- **Accountability.** Use approved systems, create accurate records, accept appropriate supervision and report errors, concerns and near misses.
- **Confidentiality with limits.** Protect information, but never promise secrecy where safety, law or a proper investigation requires sharing.
- **Proportionate judgement.** Choose the least intrusive safe option, explain material decisions and record exceptions.

Role responsibilities

Role	Required conduct oversight
Director	Approve and model the Code, resource safer working arrangements, manage conflicts, act on concerns and obtain legal, safeguarding, HR or insurer advice where needed.
Safeguarding Lead	Advise on boundaries, receive same-day safeguarding and low-level concerns, coordinate host/statutory routes, protect records and identify patterns.
Line manager / contract lead	Confirm role scope and checks, brief personnel, supervise delivery, address minor concerns early and escalate serious or repeated issues.
All personnel	Follow the Code and host rules, maintain competence and boundaries, report concerns and cooperate with proportionate enquiries.
Guests and partners	Follow the agreed briefing and supervision arrangements; never assume host status provides authority for unsupervised access or personal contact.
Concern involving the Director: The Director must not receive, screen or decide a concern about his own conduct. The reporter should contact the host or commissioning safeguarding lead and, where appropriate, HSC Trust Gateway, PSNI, a prescribed regulator or an independent adviser. Relevant evidence must be preserved.	



4. Professional behaviour and service standards

Personnel must:

- be punctual, prepared, appropriately dressed and identifiable, and tell the responsible contact promptly of delay, absence or inability to deliver safely;
- work only within their competence, approved role and agreed materials, and seek help where a participant's needs exceed that scope;
- communicate accurately and courteously; avoid promises, pressure selling, exaggerated outcomes and disparaging competitors, schools, employers or applicants;
- keep commitments, follow reasonable host instructions and leave venues, equipment and records secure;
- maintain records that are timely, factual and sufficient to explain delivery, decisions and any exception;
- raise workload, fatigue, health or personal circumstances that may materially impair safe performance before they cause harm; and
- not use PathwayX access, contacts, data, opportunities or intellectual property for undisclosed personal business or gain.

5. Equality, dignity, inclusion and accessibility

PathwayX expects respectful and inclusive conduct across employment, services and partnerships. Northern Ireland equality protections differ in structure from Great Britain, so personnel must follow PathwayX requirements and seek advice rather than assuming a single statute or list resolves every situation.

- do not discriminate, harass, bully, victimise, stereotype or use degrading, sexualised, sectarian, racist, ableist, homophobic or otherwise prejudicial language or material;
- make reasonable, role-appropriate adjustments and use accessible formats, communication support and inclusive examples where required;
- respect names, pronunciation, privacy, cultural background, religion or belief and individual communication needs without lowering safety standards;
- challenge unsafe or discriminatory behaviour calmly where safe, support the affected person and report serious or repeated conduct; and
- do not force a child to disclose personal identity, disability, family circumstance, political opinion, religion, health information or trauma unless genuinely necessary and authorised for the service or safety purpose.

Power and vulnerability: Age, disability, communication needs, care experience, poverty, trauma, minority status or dependence on an opportunity can make it harder to challenge an adult. Personnel must not treat silence, compliance, humour or apparent maturity as consent to a boundary crossing.



6. Safeguarding and professional boundaries

A child is anyone under 18. PathwayX personnel occupy a position of responsibility and may hold influence over confidence, opportunities or access to support. Relationships must remain professional even where the young person appears mature, initiates contact or asks for secrecy.

Prohibited relationships and sexualised conduct

- never pursue, encourage or engage in a sexual, romantic, exploitative, coercive or secret relationship with a child, including a 16- or 17-year-old;
- never flirt with, sexualise, groom, proposition, exchange intimate content with, or make sexual jokes or comments about a child;
- never ask a child to keep a relationship, message, meeting, gift or activity secret from a parent, school or PathwayX;
- do not pursue an adult participant while responsible for their mentoring, assessment or opportunity-related support, or where an unresolved power imbalance or conflict exists; and
- report immediately any sexualised communication, mistaken intimate content, boundary-testing contact or concern about another adult. Do not delete evidence or respond beyond what is necessary to stop contact and protect safety.

Favouritism, dependency and personal disclosure

- provide consistent support against documented service criteria; do not single out a child for special access, repeated private contact, personal gifts or opportunities without a transparent reason;
- do not encourage emotional dependency, act as a substitute parent or counsellor, use a child for personal reassurance, or share adult relationship, financial, sexual, health or workplace problems;
- keep self-disclosure brief, age-appropriate and relevant to learning; never disclose information to create intimacy or obligation;
- do not invite children to a private home, hotel room, social gathering, nightclub, bar or personal event; and
- do not arrange work, paid tasks, sponsorship, loans, accommodation or personal introductions for an individual child outside the approved PathwayX and parent/host process.

AccessNI and continuing suitability

PathwayX will determine role-based safer-recruitment, supervision and AccessNI requirements before activity begins. A disclosure certificate is not proof of current or future suitability and does not replace this Code. Personnel must tell the Director or independent responsible person promptly about any new investigation, charge, barring information, professional restriction, safeguarding concern or other circumstance that may materially affect their suitability for the role, subject to applicable law and fair handling.

No private resolution: An adult must not privately resolve a safeguarding boundary concern with a child or family, ask for forgiveness in place of reporting, or rely on the absence of a complaint. Report the facts so risk and patterns can be assessed.



7. One-to-one work and communications

In-person one-to-one activity

- the session must be authorised, timetabled and known to the relevant school/partner and, where required, the parent or guardian;
- use an observable and interruptible room, such as one with a vision panel or open door and a responsible adult nearby; avoid isolated, locked or informal private locations;
- record the date, time, location, participants, purpose and any material incident or safeguarding issue;
- do not add undisclosed sessions, change venue privately or continue after the authorised period without approval; and
- if a child becomes distressed or makes a disclosure, follow the safeguarding procedure rather than turning the session into counselling or investigation.

Messaging, email and calls

- use only approved PathwayX, school or partner accounts, numbers, platforms and contact lists;
- keep communications purposeful, professional and at reasonable times. Out-of-hours messages normally wait until the next working day unless an authorised operational or immediate safety reason requires action;
- include or make communications visible to a parent/guardian or school contact where required by the agreed plan, particularly for younger or vulnerable participants;
- do not use personal social-media accounts, disappearing messages, secret groups, private gaming accounts or unapproved encrypted side channels;
- do not request selfies, live location, passwords, account access or personal content unrelated to the service; and
- preserve and report concerning messages or images. Do not forward suspected illegal imagery, search accounts or conduct an investigation.

Video sessions and online delivery

- use waiting rooms, passwords, controlled screen sharing and host permissions; check the participant, background and display name are appropriate;
- conduct the session from a professional environment and avoid bedrooms or revealing personal location information where practicable;
- do not record, transcribe or enable AI meeting assistants without an approved purpose, prior information, required consent and data-protection review; and
- end and report a session if sexual, abusive, threatening or unsafe material appears or an unknown person joins and cannot be safely removed.



Accidental contact: If a child contacts a personal account or a message is sent through the wrong channel, do not continue the conversation. Preserve what is necessary, move the interaction to an approved route, inform the responsible lead and record the correction.

8. Physical contact, personal care, transport and visits

Physical contact and behaviour management

PathwayX careers services do not normally require physical contact, personal care or restraint. Any contact must be necessary, appropriate, proportionate, observable and sensitive to the child's wishes, disability, culture and communication needs.

- avoid initiating hugs, massage, rough play, tickling, lap-sitting, horseplay or contact that could be intimate, humiliating or misinterpreted;
- a brief handshake, fist bump or child-initiated socially ordinary contact may be accepted where appropriate, but the adult must end or redirect it if boundaries blur;
- never use corporal punishment, threatening gestures, degrading sanctions, intimidation or physical contact to enforce compliance;
- use physical intervention only in a genuine emergency to prevent immediate harm, using the minimum reasonable action and only within competence and host rules; seek help, stop as soon as safe and record/report it immediately; and
- emergency first aid should be provided by a trained and authorised person where available. Call 999 when required and follow the host's incident process.

Personal care, changing and toilets

PathwayX personnel do not provide intimate or personal care. A school, venue or parent/guardian must arrange any required support through authorised persons and an individual care plan. Personnel must not enter a toilet or changing area with a child except where an immediate emergency makes this the least unsafe option; obtain help, preserve privacy and report the circumstances.

Transport, collection and private visits

- do not transport a child alone in a personal or hired vehicle as a normal service arrangement;
- planned transport requires written authority, parent/guardian consent, suitable insurance, driver and vehicle checks, safe ratios, itinerary and collection/handover controls;
- in a genuine emergency, use the safest available option, contact the host/parent and emergency services as appropriate, avoid unnecessary isolation and record the decision;
- do not collect a child, change handover arrangements or release them to another person without authorised confirmation; and
- no private home visit is permitted unless exceptional circumstances are risk-assessed and approved in writing with suitable supervision and safeguarding controls.

Emergency exception: An emergency exception is not permission to normalise the arrangement. Record why it was necessary, who authorised or was informed, the safeguards used and any follow-up required.



9. Confidentiality, data, photography and recording

Confidential information

- access personal, commercial or safeguarding information only where required for the role and use the minimum necessary;
- use approved storage, email, devices, access controls and sharing arrangements; do not use personal email, household devices, unmanaged cloud storage or public file links for restricted material;
- keep safeguarding records separate from routine mentoring notes and do not duplicate sensitive details into general chat, CRM or complaint records;
- discuss participants, clients and personnel only with people who need the information for service, safety, legal, insurance or governance purposes;
- lock screens, protect passwords and report loss, misdirection, unauthorised access or disclosure immediately as a potential data and safeguarding incident; and
- return or securely delete records and property at the end of an engagement in accordance with PathwayX retention and legal-hold instructions.

Confidentiality is not secrecy. Information may need to be shared lawfully and proportionately to protect a child or another person, obtain safeguarding advice, investigate misconduct, comply with law or respond to an insurer, regulator or court. Record the reason and route.

Photography, video, audio and testimonials

- use images, recordings or testimonials only for a documented purpose under the agreed school/partner authority and appropriate consent/assent process; attendance is not consent;
- use PathwayX-controlled equipment or an authorised professional. Personal phones require specific prior approval and prompt secure transfer/deletion;
- respect a child's refusal even where an adult has consented, and check whether identification creates a safety risk;
- never capture children in toilets, changing areas, medical situations, distress, undress or another embarrassing or vulnerable context;
- avoid full names, live location, personal contact details and unnecessary school or uniform identifiers; and
- do not upload identifiable images, voices, testimonials or safeguarding information to public or unapproved AI, face-recognition, editing or transcription services.

Personal and covert recordings

Personnel must not secretly record meetings, calls or delivery, or publish internal/client material, unless specifically authorised by law and PathwayX after advice. If a participant requests recording for accessibility or accuracy, agree the purpose, access, retention and lawful basis before recording. A person who discovers a possible covert recording should remain professional and seek advice rather than seize a device or confront a child.



10. Integrity in applications, assessment support and AI

PathwayX prepares people to present their own abilities honestly. Personnel may explain, coach, practise, question, review and give feedback, but must preserve the applicant's authorship and every employer, school, university or assessment rule.

Permitted support	Prohibited support
Explain criteria, deadlines, stages and examples.	Create qualifications, work history, achievements, references or evidence that is not true.
Give feedback and ask questions that help the participant improve their own answer.	Write a complete personal answer for submission, impersonate the applicant or access an account without lawful, recorded authority.
Run practice aptitude tests, interviews and assessment-centre exercises.	Sit, influence or obtain answers for a live test, interview or assessment, or bypass proctoring and security controls.
Help organise information and improve clarity while preserving the participant's meaning and voice.	Submit an application, accept declarations on the person's behalf or conceal prohibited AI or third-party assistance.
Discuss ethical, transparent use of approved tools.	Guarantee an interview, offer, grade, university place or other outcome, or claim inside knowledge that PathwayX does not have.

Use of AI and digital tools

- use only approved systems for company work and follow the Data Protection & UK GDPR Policy, client restrictions and intellectual-property terms;
- do not enter identifiable child data, special-category data, safeguarding content, confidential school/employer material or non-public assessment content into an unapproved tool;
- check outputs for accuracy, bias, fabrication, age-appropriateness, copyright and disclosure requirements; the human user remains responsible;
- do not create deepfakes, impersonations, sexualised content, deceptive references or material intended to defeat an application or assessment control;
- tell the participant when AI meaningfully shaped feedback or content where transparency is relevant, and require them to verify and own the final work; and
- stop and seek a data-protection/safeguarding review before high-risk profiling, automated decisions, emotion recognition, biometric use or new tools involving children.

The participant's work: A polished application is not valuable if it is dishonest or cannot be defended at interview. Personnel must build capability, not manufacture a result.



11. Conflicts, gifts, hospitality, bribery and money

Conflicts of interest

Declare any personal, family, financial, school, employer, recruitment, supplier or outside-business interest that could influence, or reasonably appear to influence, a PathwayX decision. Do so before taking part where possible. The Director or independent responsible person records the conflict and decides whether disclosure, recusal, supervision, reassignment or refusal is required.

- do not steer a participant toward a role, provider or employer because of undisclosed commission, friendship, investment or benefit;
- do not use confidential opportunity, participant or employer information for personal trading, recruitment, business development or another client;
- do not supervise, assess, contract with or approve payment to a close relative or partner without prior declaration and independent approval; and
- update a declaration if circumstances change. Apparent conflicts matter even where the person believes they can remain impartial.

Gifts and hospitality

- never give or accept cash, cash equivalents, loans, personal discounts or gifts intended to secure favourable treatment;
- do not exchange personal gifts with an individual child. A small, transparent programme token distributed consistently may be used only with approval;
- decline or declare gifts and hospitality that are more than nominal, repeated, private, timed around a decision or capable of creating obligation; and
- record any approved exception, donor/recipient, approximate value, purpose and decision. Host-school rules may be stricter and must be followed.

Bribery, fraud and financial integrity

- do not offer, promise, give, request or accept a bribe, kickback, secret commission or improper advantage;
- do not create false invoices, expenses, attendance, qualifications, consent, results, references or delivery records;
- use company payment routes, obtain required approval and keep receipts/evidence for legitimate expenditure;
- do not borrow from, lend to, sell personal goods/services to, or solicit donations from a child or their family through the mentoring relationship; and
- report suspected fraud, theft, bribery, procurement manipulation or money misuse promptly and preserve relevant records.

No commercial pressure over safety or honesty: Revenue, targets, client seniority, friendship or fear of losing a contract never justifies concealing a conflict, misleading a customer or delaying a safety report.



12. Health, safety, substances and company property

- follow risk assessments, venue rules, emergency instructions, safe ratios, attendance and handover arrangements; report hazards, injuries, near misses and unsafe changes promptly;
- do not undertake a task, drive or supervise while impaired by alcohol, illegal drugs, misused medication, fatigue or another condition that makes delivery unsafe;
- do not possess, use, promote or supply illegal drugs, alcohol, nicotine products, vapes, tobacco, gambling products or sexually explicit material during delivery or around children;
- prescribed medication and private health information are handled sensitively, but a person must disclose functional limitations necessary to keep activity safe;
- use company/client devices, accounts, funds, venues and equipment lawfully, securely and only for authorised purposes; and
- report damage, loss, theft, malware, unsafe equipment or unauthorised access; do not conceal it or attempt an unsafe repair.

13. Social media, public statements and outside conduct

- only authorised people may speak for PathwayX, respond to media, issue public statements or use the brand in campaigns, endorsements or political activity;
- do not identify, discuss, tag, follow or connect privately with a child participant through personal social media, even if the request came from the child;
- do not post confidential information, internal disputes, participant stories, client material or images obtained through PathwayX without authority;
- make clear when a permitted public comment is personal, but recognise that a disclaimer does not excuse unlawful, discriminatory, threatening, dishonest or safeguarding-relevant conduct;
- do not use the PathwayX role to endorse gambling, alcohol, nicotine, sexual content, high-risk financial products, partisan activity or another product inappropriate for children; and
- report online abuse, impersonation, doxxing, threats or content that creates a child-safety or company-security risk; preserve evidence without amplifying harmful material.

PathwayX does not seek to control lawful private life. However, conduct outside work may be relevant where it reasonably calls into question a person's suitability to work with children, honesty, confidentiality, safety, legal compliance or ability to retain client trust. Any response must be fair, proportionate and consistent with the person's legal status and rights.



14. Reporting concerns, mistakes and wrongdoing

Report promptly when conduct may breach this Code, place a child or adult at risk, involve a crime or data incident, indicate unsuitability, or form part of a pattern. Good-faith reporters and witnesses must not be threatened, disadvantaged or pressured to withdraw. A report that is mistaken or unproven is not misconduct merely because it is not upheld.

Immediate reporting route

1. **Step 1 - Protect.** Call 999 for immediate danger, serious injury or a crime in progress. Take reasonable protective action without creating further risk.
2. **Step 2 - Report.** Tell the PathwayX Safeguarding Lead and, during school delivery, the school's Designated Teacher on the same day. If either is implicated, bypass them.
3. **Step 3 - Preserve.** Keep relevant messages, documents and factual notes secure. Do not delete, edit, circulate widely, question witnesses or search devices/accounts.
4. **Step 4 - Record.** Write what was seen, heard, disclosed or done; date, time, location, people present, exact words where relevant and actions taken. Distinguish fact from opinion.
5. **Step 5 - Confirm and escalate.** Confirm the concern reached an appropriate person. If no safe or timely action follows, contact the host safeguarding lead, HSC Trust Gateway, PSNI, regulator or prescribed person as appropriate.

Low-level concerns and self-reporting

A low-level concern is behaviour inconsistent with this Code even where it does not appear to meet the threshold for statutory referral. Examples include over-familiarity, favouritism, unnecessary isolation, personal messaging, an inappropriate joke, a private gift, misuse of an image or repeated failure to record. Report it promptly so context and patterns can be assessed. Personnel must also report their own accidental breach or near miss; early honesty supports proportionate correction, while concealment increases concern.

Whistleblowing and external reports

- use the PathwayX route where safe, but do not use internal hierarchy to delay an emergency, statutory safeguarding referral or lawful protected disclosure;
- a worker who reasonably believes there is qualifying wrongdoing may have legal whistleblowing protection when reporting through an appropriate route; obtain independent advice where unsure;
- confidentiality duties do not prevent lawful reports to police, safeguarding bodies, regulators, prescribed persons or legal advisers, but do not publish sensitive information more widely than necessary; and
- anonymous concerns are considered, although limited information may restrict enquiries. PathwayX will protect identity so far as lawful and practicable, without promising absolute secrecy.

If the Director is implicated: Do not send the report only to PathwayX's general inbox or the implicated person. Contact the school/host safeguarding lead and the relevant HSC Trust Gateway Service and/or PSNI. For workplace wrongdoing, seek advice on an appropriate prescribed-person or legal route.



15. Responding to breaches and allegations

PathwayX separates immediate protective action from findings. A temporary change of duties, increased supervision, removal from delivery or suspension may be necessary while advice is obtained; it is a neutral safety measure and not a finding of guilt. Child-protection, criminal, client, insurance, data-protection and employment/contract processes may run separately and at different times.

PathwayX will, as appropriate:

- protect affected people and arrange alternative support or safe service continuity;
- notify the host safeguarding lead, HSC Trust, PSNI, insurer, data-protection lead, legal adviser, regulator or AccessNI/DBS route where required;
- appoint a person without a material conflict to gather facts and keep a clear audit trail;
- give the person concerned sufficient information and a fair opportunity to respond, subject to safety, confidentiality and external-investigation limits;
- consider the nature, impact, intent, pattern, position of trust, honesty, training, mitigation and risk of recurrence; and
- record findings, reasons, protective/corrective action, referrals, retention and any learning for wider services.

Possible action

Action may include advice, reflective supervision, training, a written instruction, closer supervision, restriction or removal of duties, a disciplinary or capability process, termination of employment or contract, withdrawal of volunteer/representative status, notification to a client or insurer, and referral to statutory or professional bodies. The process and rights depend on legal status, contract, seriousness and external duties; this Code does not replace a fair disciplinary, grievance or contractual procedure.

Serious misconduct examples: Sexual or exploitative conduct; deliberate private contact or grooming; violence or serious intimidation; supplying harmful substances; serious discrimination or harassment; fraud or bribery; dishonest application assistance; retaliation; concealment of a safeguarding concern; serious data misuse; or knowingly working while barred or materially unsuitable may justify immediate protective removal and potential termination/referral.

16. Training, monitoring and review

Before relevant duties begin, personnel receive the Code, role boundaries, safeguarding and data-protection briefing, host rules and reporting contacts. A signed declaration is retained. Refresher training and supervision are proportionate to the role and at least annual for regular child-facing personnel. PathwayX reviews conduct concerns, complaints, incidents, near misses, conflicts, gifts and corrective actions for patterns without unnecessary identifying detail.

The Code is reviewed at least annually and sooner following a serious incident, repeated concern, change in services, law or guidance, insurer/client requirement or evidence that the controls are not working. Superseded versions are archived and personnel are briefed on material changes.



Appendix A - Practical do / do not guide

Use this summary during induction, pre-delivery briefings and supervision. It does not replace the detailed Code.

Do	Do not
Use authorised, observable and interruptible working arrangements.	Seek secret, unnecessary or isolated access to a child.
Use approved professional accounts and keep contact purposeful.	Use personal social media, disappearing messages or a private side channel.
Treat every participant fairly, respectfully and accessibly.	Humiliate, sexualise, threaten, discriminate, retaliate or show favouritism.
Coach applicants to produce and defend their own honest work.	Write or submit their application, impersonate them or help defeat an assessment control.
Declare conflicts, gifts, outside interests and mistakes promptly.	Accept cash, secret benefits, personal gifts from children or an improper advantage.
Use approved equipment and a documented consent process for media.	Use personal photos/recordings, covertly record or post a participant without authority.
Protect information and share safeguarding facts through the correct secure route.	Promise secrecy, gossip, upload child data to public AI or conceal a breach.
Be fit, sober, prepared and compliant with health and safety controls.	Attend impaired, smoke/vape around children or supply alcohol, nicotine, drugs or gambling products.
Report low-level concerns, allegations and your own accidental boundary crossings.	Investigate abuse yourself, delete evidence, confront the alleged person or delay reporting.
Bypass an implicated leader and use the host/statutory route.	Assume seniority, reputation, revenue or friendship changes the safeguarding standard.

Pause test: Before acting, ask: Is it necessary for the service? Is it authorised? Is it observable and recordable? Would I be comfortable explaining it to the child, parent, school and Safeguarding Lead? If not, pause and seek advice.



Appendix B - Conduct concern and incident record

Complete as soon as possible and send through the approved secure route. Do not rely on this form in an emergency: call 999 or contact the safeguarding lead/statutory service directly. General contact: pathwayx.coaching@gmail.com.

Reporter name / role	
Safe contact details	
Date / time reported	
Person(s) concerned	
Child / participant affected	
Service / school / location	
Date / time of event	
What was seen, heard or disclosed?	
Exact words used, where relevant	
Who else was present?	
Immediate safety action	
Evidence preserved and location	
Who was informed, when and how?	
Advice / reference number	

Initial classification

- ☐ Immediate danger / emergency services
- ☐ Safeguarding concern or disclosure
- ☐ Allegation about a person in a position of trust
- ☐ Low-level conduct concern or boundary issue
- ☐ Data, confidentiality or technology incident
- ☐ Discrimination, harassment, fraud, bribery or other wrongdoing
- ☐ Self-reported mistake / near miss

The recipient must not erase the original account. Add subsequent decisions, advice and corrections as dated entries in the restricted case record.



Appendix C - Personnel declaration and adoption record

Personnel declaration

I confirm that I have received, read and understood the PathwayX Ltd Professional Code of Conduct and the policies relevant to my role. I understand that compliance is a condition of being authorised to represent PathwayX, subject to my contract and legal status.

- ☐ I will maintain professional boundaries and use only authorised working and communication arrangements.
- ☐ I will not form an inappropriate relationship with a child, complete applications or assessments dishonestly, misuse information or conceal a concern.
- ☐ I will follow host-school rules and PathwayX safeguarding, data-protection, complaints and incident procedures.
- ☐ I will report low-level concerns, allegations, wrongdoing, conflicts, gifts, mistakes and circumstances that may materially affect my suitability or safe performance.
- ☐ I will cooperate with proportionate supervision, training, record-keeping and lawful enquiries.
- ☐ I know how to bypass an implicated person and use the host or statutory safeguarding route.

Full name	
Role / organisation	
Signature	
Date	
Induction completed by	
Next refresher due	
Version acknowledged	1.0

Formal adoption

Approved by	Ben Glasgow
Role	Director
Signature	
Approval date	4 August 2026
Operational from	4 August 2026
Next review	4 August 2027

Record control: Keep the signed declaration and training record securely. Re-acknowledgement is required after a material revision or role change, not merely because the annual review date passes.



Appendix D - References and implementation checklist

PathwayX documents

Child Protection & Safeguarding Policy
Data Protection & UK GDPR Policy
Privacy Notice
Complaints Handling Policy and Procedure
Terms of Business

Northern Ireland and UK sources

[Department of Education NI - Safeguarding and Child Protection in Schools \(September 2023\), including Annex C Code of Conduct](#)
[Department of Health NI - Co-operating to Safeguard Children and Young People in Northern Ireland](#)
[Department of Health NI - Guidance on Information Sharing for Child Protection Purposes](#)
[nidirect - Regulated activity with vulnerable groups](#)
[nidirect - Types of AccessNI checks](#)
[ICO - A 10 step guide to sharing information to safeguard children](#)
[Equality Commission for Northern Ireland - Equality laws in Northern Ireland](#)
[Ministry of Justice - Bribery Act 2010 guidance](#)
[nidirect - Blowing the whistle on workplace wrongdoing](#)
[Legislation.gov.uk - Sexual Offences \(Northern Ireland\) Order 2008](#)

Pre-implementation checklist

- ☐ Director formally approves and dates the Code.
- ☐ Role descriptions identify child contact, supervision, communications and data access.
- ☐ Role-based AccessNI eligibility and safer-recruitment controls are confirmed before activity.
- ☐ Insurance and host/client requirements are checked against actual service delivery.
- ☐ Named alternative route exists for concerns about the Director/DSL.
- ☐ Approved accounts, devices, platforms, storage and reporting forms are operational.
- ☐ Personnel complete induction and sign Appendix C before relevant duties.
- ☐ Guests and partner representatives receive a proportionate written briefing.
- ☐ Annual refresher, supervision and review dates are diarised.

Document status: Final - formally adopted and signed. The Code must be implemented, supervised and enforced in practice, and reviewed whenever staffing, approved technology, insurance, services, host arrangements or reporting contacts materially change.