



PATHWAYX

BRIDGING EDUCATION & EMPLOYMENT

CHILD PROTECTION & SAFEGUARDING POLICY

Safeguarding children and young people across school workshops, mentoring, events and online engagement.

Organisation	PathwayX Ltd
Company number	NI742566
Policy owner	Ben Glasgow, Founder & Director
Version / status	Version 1.0 Final - adopted and signed
Issue / review	4 August 2026 Review by 4 August 2027

NORTHERN IRELAND

This policy should be read with the safeguarding procedures of each host school or partner organisation. Where standards differ, the safer or more protective requirement applies.



Contents

Use this page as the policy index. Page references are fixed to this version and should be refreshed after any amendment.

Purpose and commitment	3
Scope, definitions and principles	3
Governance and responsibilities	4
Safer recruitment, vetting and training	5
Safe delivery arrangements	6
Recognising safeguarding concerns	7
Responding to a concern or disclosure	8
Referrals and escalation	9
Allegations and low-level concerns	10
Code of conduct	10
Photography, filming and media	11
Data protection, confidentiality and records	12
Complaints, whistleblowing and learning	13
Monitoring, approval and review	13
Appendix A - Quick response procedure	15
Appendix B - Safeguarding concern record	16
Appendix C - Pre-delivery safeguarding checklist	18
Appendix D - Photography and video consent form	19
Appendix E - Staff acknowledgement	20
Legal and good-practice sources	21

Safeguarding first: If anyone is in immediate danger, call 999. Every other concern must be recorded and passed on the same day - normally to the PathwayX Designated Safeguarding Lead and, for school-based activity, the school's Designated Teacher.

Document status: Final - adopted and signed by the Director. This version is operational from 4 August 2026.



Purpose and commitment

PathwayX Ltd provides careers education, workshops, mentoring, assessment-centre preparation, events and related online support to school-age students. PathwayX is committed to creating environments in which every child and young person is respected, heard and protected from harm.

The welfare and best interests of the child are the primary consideration in every decision made under this policy. Safeguarding is everyone's responsibility: no commercial, reputational, operational or confidentiality concern takes priority over a child's safety.

- give equal priority to the safety of every child under 18, regardless of age, disability, race, ethnicity, religion or belief, sex, sexual orientation, gender identity, family circumstances, care experience, social background or any other status;
- work in partnership with children, parents and carers, schools, partner organisations and statutory services;
- listen to concerns, act promptly, record accurately and share information lawfully when necessary to protect a child;
- maintain safer recruitment, vetting, conduct, supervision, risk-management and data-protection arrangements; and
- review practice after incidents, complaints, legal developments or material changes to PathwayX services.

Host-school rule: When PathwayX delivers activity in a school or for another partner, that organisation's safeguarding procedures also apply. PathwayX personnel must receive the local briefing, know the Designated Teacher or safeguarding contact, and follow the more protective requirement if procedures differ.

Scope, definitions and principles

This policy applies to the Director, employees, contractors, associates, mentors, speakers, volunteers, work-experience participants and anyone acting in the name of PathwayX. Compliance is a condition of appointment and engagement.

Term	Meaning in this policy
Child / young person	Any person under 18. This includes 16- and 17-year-olds, even where they appear independent or are applying for employment or apprenticeships.
Safeguarding	Preventing harm, promoting welfare, creating safe practice and responding to concerns before or after harm occurs.
Child protection	Action taken when a child is suffering, or is at risk of suffering, significant harm.
Personnel	Every adult or young worker engaged by, representing or delivering services for PathwayX, whether paid or unpaid.
DSL	The PathwayX Designated Safeguarding Lead. The term is used for clarity; Northern Ireland voluntary-sector guidance may also use Designated Officer.
Host organisation	The school, college, youth setting, employer, venue or partner commissioning or hosting an activity.



Core principles

- Take children seriously. A child does not need to use the word 'abuse' for a concern to require action.
- Act on reasonable concern; proof is not required before information is passed to safeguarding professionals.
- Use the least intrusive action consistent with safety, but never delay because information is incomplete.
- Do not investigate. PathwayX records and refers; statutory services determine whether and how to investigate.
- Share information on a need-to-know basis. Consent is desirable where safe and appropriate, but is not required where seeking it may place a child at risk or prejudice protection activity.
- Respect the child's voice, communication needs, privacy and right to be kept appropriately informed.

Governance and responsibilities

Role	Named person / responsibilities
Director and policy owner	Ben Glasgow, Founder & Director. Approves the policy; provides resources; ensures safer recruitment, insurance and risk controls; and commissions independent advice where a concern involves the Director.
Designated Safeguarding Lead	Ben Glasgow. Receives concerns, checks immediate safety, consults the host school's Designated Teacher, makes or supports referrals, maintains secure records, monitors patterns and ensures follow-up.
Alternative route	If a concern relates to the Director/DSL, or the DSL is unavailable and delay could increase risk, report directly to the host school's Designated Teacher, the relevant HSC Trust Gateway Service and/or PSNI. The Director must not screen or influence a concern about himself.
Data Protection Lead	Ben Glasgow until another person is formally appointed. Maintains privacy information, access controls, retention, breach response and ICO compliance, and ensures safeguarding information is shared securely.
All personnel	Complete required checks and training; follow this policy and the host procedure; maintain boundaries; report and record concerns immediately; cooperate with safeguarding action; and preserve confidentiality.
Host school / partner	Retains its own statutory and organisational responsibilities. PathwayX agrees named contacts, supervision, consent, rooming, attendance and emergency arrangements before delivery.

DSL contact

Name	Ben Glasgow
Role	Founder & Director / Designated Safeguarding Lead
Email	pathwayx.coaching@gmail.com
Escalation if unavailable or implicated	Host school's Designated Teacher, HSC Trust Gateway Service or PSNI



Governance safeguard: Before PathwayX permits regular unsupervised one-to-one work, it will appoint and train a Deputy or independent safeguarding adviser who is able to receive concerns about the DSL. Until then, delivery must remain within host-school or otherwise appropriately supervised arrangements.

Safer recruitment, vetting and training

PathwayX will use role-specific safer recruitment. Selection and vetting must be completed before a person begins regulated or unsupervised work with children; an urgent business need is never a reason to bypass safeguards.

- a written role description that identifies child contact, supervision, online access and data access;
- identity and right-to-work checks, relevant qualifications and employment-history review;
- at least two suitable references, including the most recent relevant employer where possible, with safeguarding questions asked;
- a declaration of relevant convictions, cautions, investigations, disciplinary matters, barred-list status and conflicts, subject to applicable rehabilitation and filtering law;
- a risk-based interview that tests motivation, boundaries, judgement and response to safeguarding scenarios;
- the appropriate AccessNI check for the actual role, including an Enhanced check and barred-list check where the role is eligible and involves regulated activity;
- recorded decision-making where information is disclosed, with specialist advice obtained when needed; and
- a code-of-conduct declaration, induction, supervision and probation or initial review period.

AccessNI controls

Eligibility and level of check must be determined for each role, with reference to Department of Education Circular 2025/06, AccessNI guidance and the Safeguarding Vulnerable Groups (Northern Ireland) Order 2007. A certificate is one part of safer recruitment and does not establish suitability on its own.

- PathwayX will not knowingly engage a person who is barred from the relevant regulated activity.
- PathwayX records the check date, level, workforce, certificate reference and recruitment decision. It does not normally retain a certificate copy; if needed to resolve a dispute, the copy is securely destroyed within six months.
- Checks are reviewed when a role changes, new information arises or law/guidance requires a fresh check. Personnel must promptly disclose relevant new police, disciplinary or safeguarding matters.



Training and supervision

- All personnel receive safeguarding induction before child contact, including recognition, disclosure response, reporting, boundaries, online safety, data handling and the host-school procedure.
- Personnel receive at least annual updates and role-appropriate refresher training. The DSL completes recognised Designated Officer/Lead training and refreshes it at least every three years or sooner if guidance changes.
- Supervision considers conduct, low-level concerns, wellbeing, complaints and learning. Delivery observations may be used with appropriate consent and data safeguards.

Insurance and business controls

Before service delivery, PathwayX confirms appropriate public liability and professional indemnity cover and, where applicable, employers' liability cover. It discloses the nature of school, mentoring, event and online activity to its insurer and checks exclusions, limits, record-retention requirements and notification duties. Membership or support obtained through FSB or another provider does not replace these checks or PathwayX's safeguarding duties.

Safe delivery arrangements

Planning with schools and partners

- Confirm the host safeguarding contact, emergency and first-aid arrangements, attendance list, age range, additional needs, rooming, supervision and collection arrangements.
- Agree which organisation is responsible for parental information and consent, photography permissions, online-platform access and retention of attendance or evaluation data.
- Complete a proportionate written risk assessment for the activity, venue, travel, equipment, online features and participant needs.
- Brief all PathwayX personnel and visiting speakers. Visitors do not have unsupervised access unless this has been expressly approved and all checks are complete.
- Keep a register of attendees and personnel. Record significant changes, incidents, early departures and handovers.

One-to-one mentoring

- The session must be authorised and known to the school/partner and, where required, the parent or carer.
- Use a professional, observable and interruptible setting: for example, a room with a vision panel, an open door, or a nearby responsible adult. Avoid isolated rooms and informal private locations.
- Record the time, place, participants, purpose and any safeguarding issue. The mentor must not arrange undisclosed extra sessions.
- No home visits are permitted unless exceptional circumstances are risk-assessed, approved in writing by the DSL and host, and involve suitable safeguards.



- A PathwayX adult must not transport a child alone except in a genuine emergency where the safer option is to protect immediate welfare; the DSL and parent/host must be informed as soon as possible and the decision recorded.

Online mentoring and communication

- Use only approved PathwayX, school or partner accounts and platforms. Personal social-media accounts, disappearing-message services and secret or encrypted side channels are prohibited.
- Agree who may contact the young person directly. Where practical, include a school contact or parent/carer, especially for under-16s and any child identified as vulnerable.
- Keep communication professional, relevant and within reasonable hours. No sexualised content, private relationship discussion, requests for secrecy or boundary-blurring contact is permitted.
- Use waiting rooms, passwords, controlled screen sharing and host settings for video sessions. Do not record without specific prior permission and a documented purpose.
- Do not enter identifiable child information, school safeguarding records, photographs or disclosures into public or unapproved generative-AI tools. New technology that creates high risk requires a data protection impact assessment and safeguarding review.
- Any concerning message, image, disclosure or contact attempt must be preserved securely and reported; do not forward illegal imagery or investigate accounts.

Physical contact, personal care and emergencies

PathwayX services do not normally require personal care or physical contact. Any contact must be necessary, appropriate, proportionate to the situation and sensitive to the child's wishes and needs. Emergency first aid should be provided by an appropriately trained person where available. In an emergency, call 999 and follow the host procedure; inform the DSL and parent/carer through the agreed route.

Additional vulnerability and inclusion

Some children face additional barriers to recognition or disclosure, including disabled or d/Deaf children, children with communication needs, children in care, LGBTQ+ young people, children affected by domestic abuse, poverty, racism, exploitation or previous trauma. Adjust communication and supervision without lowering expectations for safety. Do not assume behaviour or injury is explained by disability, culture or family circumstance.

Recognising safeguarding concerns

A concern may arise from a disclosure, observation, injury, change in behaviour, online content, a complaint, information from another person, unsafe adult conduct or a pattern of smaller incidents. Indicators do not prove abuse; they require curiosity, recording and appropriate referral.

Category	Examples and possible indicators
Physical abuse	Hitting, shaking, burning, poisoning, inappropriate restraint or fabricated/induced illness; unexplained or inconsistent injuries; fear of going home.
Emotional abuse	Persistent humiliation, threats, rejection, coercive control, exposure to frightening events, severe bullying or developmentally inappropriate expectations; withdrawal, anxiety or extreme behaviour.



Category	Examples and possible indicators
Sexual abuse	Forcing or enticing sexual activity, contact or non-contact abuse, sexual images, grooming or exploitation; sexualised behaviour, unexplained gifts, fear of a person or online contact.
Neglect	Persistent failure to meet basic physical or psychological needs, including food, shelter, supervision, healthcare, education or emotional availability; hunger, poor hygiene, tiredness or unsafe care.
Exploitation	Child sexual exploitation, criminal exploitation, trafficking, forced labour, coercion into crime or exchange of activity for money, status, gifts or protection; missing episodes, unexplained money or controlling associates.
Online harm	Grooming, sexual extortion, cyberbullying, harmful content, image-based abuse, impersonation, location exposure, coercive contact or AI-generated abuse.
Other safeguarding issues	Domestic abuse, self-harm or suicidal statements, substance misuse, discrimination/hate, harmful sexual behaviour, female genital mutilation, forced marriage, honour-based abuse, radicalisation or risk from community/paramilitary activity.

Do not wait for certainty: Personnel report the facts and the basis for concern. The DSL, host safeguarding lead and statutory services decide the appropriate next step.

Responding to a concern or disclosure

If a child speaks about harm, the adult's first response can affect whether the child feels believed and whether evidence is preserved. Stay calm and focus on safety.

1. **Listen.** Give full attention, allow pauses and take the child seriously.
2. **Reassure.** Say they have done the right thing by telling you and that the harm is not their fault.
3. **Explain.** Do not promise secrecy. Explain that you must share the concern with people whose job is to help keep them safe.
4. **Clarify only.** Use minimal, open prompts such as 'Tell me what happened' or 'Is there anything else you want me to know?' Do not lead, interrogate, challenge or ask the child to repeat the account.
5. **Protect.** If there is immediate danger or urgent medical need, call 999 and follow the host emergency procedure.
6. **Report.** Tell the DSL and, in a school, the Designated Teacher immediately or as soon as safely possible on the same day.
7. **Record.** As soon as possible, write the child's exact words, factual observations, date, time, place, who was present, questions asked and actions taken. Sign and date the record.
8. **Preserve.** Keep relevant messages, emails or files secure. Do not copy, forward, download or deliberately view suspected illegal child sexual abuse material; seek police advice.

What not to do

- Do not promise confidentiality, make guarantees about outcomes or tell the child to confront anyone.



- Do not investigate, search devices/accounts, contact the alleged person or alert them before safeguarding advice.
- Do not ask a parent/carer for consent to refer if doing so may increase risk, cause evidence to be lost or delay protection.
- Do not discuss the concern with colleagues, friends or family who do not need the information.
- Do not wait until the next working day where immediate or significant risk may exist.

Referrals and escalation

The DSL considers immediate safety, consults the host Designated Teacher where applicable and decides without delay whether advice or referral is required. PathwayX may refer directly; it does not need the host's permission to protect a child.

Situation	Required action
Immediate danger, serious injury or crime in progress	Call 999. Take reasonable protective action without placing others at risk. Then notify the host safeguarding lead and PathwayX DSL.
Concern that a child is abused, harmed or likely to suffer harm	Contact the HSC Trust Gateway Service for the area where the child lives and/or PSNI. Share relevant, accurate information and record the advice, decision and reference details.
School-based disclosure or concern	Report immediately to the school's Designated Teacher and the PathwayX DSL, unless either is implicated. Confirm who is making the statutory referral; do not assume the other party has done so.
Concern about the PathwayX DSL/Director	Do not report first to the implicated person. Contact the host Designated Teacher and HSC Gateway/PSNI directly. Preserve records and seek independent safeguarding/legal advice.
Uncertainty	Consult HSC Gateway or the NSPCC Helpline. Uncertainty is not a reason to take no action.
Dissatisfaction or no response	Escalate to a more senior safeguarding contact in the host organisation or Trust, or contact PSNI. Record why further escalation was necessary.

Information to provide

- the child's name, age/date of birth, address or school and parent/carer details, if known;
- what was seen, heard or disclosed, using exact words where relevant;
- when and where it happened and who may be involved;
- immediate safety, medical or communication needs;
- other children who may be at risk;
- action already taken and who else has been told; and
- the reporter's name, role and contact details, unless an anonymous report is necessary.

Responsibility: The person who identifies the concern remains responsible for ensuring it reaches an appropriate safeguarding professional. Passing it to a colleague without confirming receipt is not enough.



Allegations and low-level concerns

An allegation or concern about an adult must be taken seriously whether it concerns harm, a possible offence, breach of boundaries, inappropriate conduct, suitability to work with children or a pattern of low-level behaviour. The wishes or status of the adult do not override child safety.

Allegation against PathwayX personnel

1. Ensure immediate safety and medical help if needed.
2. Report to the DSL and host Designated Teacher without delay. If the concern relates to the DSL/Director, use the alternative route in this policy.
3. Do not interview the child or accused person, alert witnesses, promise a particular outcome or attempt an internal fact-finding exercise before professional advice.
4. The Director obtains safeguarding, employment and legal advice and informs the insurer where the policy requires notification.
5. Consider temporary protective measures, including redeployment, increased supervision, suspension or removal from delivery. Suspension is a neutral act and not a finding of guilt.
6. Cooperate with HSC/PSNI and any host-school process. A criminal, child-protection and employment process may proceed separately.
7. Consider AccessNI/DBS referral duties where the legal conditions are met and record the decision.

Low-level concerns

A low-level concern is conduct that is inconsistent with this code, even if it does not appear to meet the threshold for referral. Examples include over-familiarity, favouritism, humiliating language, unnecessary one-to-one isolation, private messaging, inappropriate jokes, gifts or photographing children outside procedure. Report it promptly so patterns can be identified and addressed.

Fairness and confidentiality

Information is restricted to those who need it. PathwayX will support the child and the person who raised the concern, protect against retaliation, and treat the accused person fairly without compromising safety or statutory action. No finding is communicated beyond what is lawful and necessary.

Code of conduct

Personnel must	Personnel must not
Treat children with dignity, fairness and professional respect.	Develop sexual, romantic, exploitative or otherwise inappropriate relationships with a child, including a 16- or 17-year-old.
Use observable, authorised working arrangements and maintain appropriate adult-child ratios.	Seek private, secret or unnecessary one-to-one contact, including through personal social media or disappearing messages.
Use language, content, examples and humour suitable for the age group.	Use humiliating, discriminatory, sexualised, threatening or boundary-blurring language or behaviour.



Personnel must	Personnel must not
Report gifts, invitations, conflicts and accidental boundary crossings to the DSL.	Give significant personal gifts, money or special treatment; accept gifts that create obligation; or show favouritism.
Challenge bullying, harassment and discriminatory behaviour safely.	Use physical punishment, intimidation, unnecessary restraint, rough play or sexually suggestive games.
Wear suitable identification and follow host rules for access, devices and photography.	Consume alcohol or illegal drugs during delivery, attend impaired, smoke/vape around children, or promote gambling or harmful products.
Use reasonable, proportionate action to protect a child in an emergency and record it.	Share a child's information, image or story for entertainment, promotion or professional networking without authority and consent.
Report any concern, allegation, mistake or policy breach promptly.	Retaliate against a reporter, suppress a concern, investigate independently or ask anyone to keep safeguarding information secret.

Breaches may lead to removal from activity, disciplinary action, termination of engagement, referral to statutory agencies or referral to AccessNI/DBS where required. Honest reporting of a minor mistake will be handled proportionately; concealment or repeated boundary breaches are serious.

Photography, filming and media

Photographs, video, audio and testimonials can identify a child and create safeguarding and data-protection risk. PathwayX will use them only for a clear, documented purpose and under an agreed school/partner and consent process.

- Provide clear information before capture: what will be taken, why, where it may appear, who will receive it, how long it will be retained and how consent can be withdrawn.
- Obtain the host organisation's authority and the appropriate parent/carers and child agreement. A child's refusal is respected even where an adult has consented.
- Use PathwayX-controlled equipment or an authorised professional. Personal phones must not be used unless expressly approved for a specific reason and images are transferred and deleted promptly under supervision.
- Avoid full names with images, live location details, personal contact information and unnecessary school or uniform identifiers. Check whether any child must not be identifiable for safety reasons.
- Do not photograph children in changing areas, toilets, medical situations, distress, undress or any context that could be embarrassing or misused.
- Store assets securely with access limited to authorised people. Do not upload children's images to public AI-generation, face-recognition or editing tools.
- Moderate comments and messages on published content. Remove or restrict content if a safeguarding risk emerges, even if consent was originally obtained.
- Record the consent source, purpose, channels, date and withdrawal. Withdrawal stops future use as soon as reasonably practicable; limits on recalling already printed or redistributed material must be explained.



No implied consent: Attendance at a workshop or event does not by itself permit photography, filming, testimonials or promotional use.

Data protection, confidentiality and records

PathwayX processes children's information in accordance with the UK GDPR, Data Protection Act 2018 and current ICO guidance, including the higher level of protection owed to children. PathwayX documents the purpose and lawful basis for each processing activity and provides concise, age-appropriate privacy information.

Data minimisation and security

- Collect only information necessary for delivery, safety, evaluation, legal obligations or an agreed purpose. Do not collect special-category or criminal-offence information routinely.
- Keep participant, consent and safeguarding information in approved systems with strong access controls, multi-factor authentication where available, secure backups and encryption in transit.
- Keep safeguarding records separate from general mentoring notes. Access is limited to the DSL and others who need the information for protection, legal or governance purposes.
- Do not use personal email, unmanaged cloud storage, shared household devices or unapproved apps for safeguarding records.
- Use a written data-sharing or processing arrangement with schools/partners where roles and responsibilities require one. Confirm which party is controller or processor for each dataset.
- Carry out a data protection impact assessment before high-risk processing, large-scale tracking, sensitive profiling, new AI uses or significant automated decision-making involving children.

Sharing and confidentiality

Safeguarding information is confidential but not secret. It may be shared without consent when necessary and lawful to protect a child or another person, prevent or detect crime, comply with a legal duty or obtain professional safeguarding advice. Share the minimum necessary with the right person, through a secure method, and record what was shared, with whom, why and when.

Safeguarding records

- Create a separate record for each child as soon as a concern arises. Use factual language; distinguish observation, allegation, professional advice and opinion.
- Record the incident/disclosure and report times, names and roles, exact words, witnesses, relevant child details, action, referral, advice, outcome and reasons for any decision not to refer. The author signs and dates the record.
- Maintain an access log and an audit trail of amendments. Never erase an original entry; correct it transparently.
- For this policy version, retain a child's protection file until the child's 30th birthday, reflecting Northern Ireland education guidance, unless law, an inquiry, litigation, insurer requirements or safeguarding advice requires longer. Review access and necessity periodically.



- For concerns about an adult's conduct, retain records at least until normal retirement age or for 10 years from the allegation, whichever is longer, subject to specific Northern Ireland school/host, legal, inquiry or insurer requirements.
- At the end of an authorised retention period, destroy paper records securely and irretrievably purge electronic copies. If PathwayX closes, the Director arranges lawful custody, retention and eventual destruction.

Personal data breaches

Any loss, misdirection, unauthorised access, disclosure or alteration of personal information must be reported immediately to the Data Protection Lead and treated as a potential safeguarding issue. Contain the incident, preserve evidence, assess risk and record the decision. A notifiable breach must be reported to the ICO without undue delay and, where feasible, within 72 hours; affected people must be informed where the law requires.

ICO fee and accountability

The Director will assess whether PathwayX must register and pay the ICO data-protection fee, keep the assessment under review as services change, and maintain privacy notices, retention schedules, data maps, processor contracts, consent records and breach logs appropriate to the organisation's risk.

Complaints, whistleblowing and learning

Children, parents/carers, schools, personnel and members of the public may raise concerns verbally or in writing. Information should be accessible and children must not be disadvantaged for speaking up. A safeguarding concern is acted on immediately and is not held back while a complaint is processed.

- Safeguarding concerns: report to the DSL or use the alternative route if the DSL is implicated.
- Service complaints: send to the Director at pathwayx.coaching@gmail.com. The Director acknowledges, assesses risk and responds under the complaints procedure.
- Whistleblowing: personnel may bypass management and contact the host safeguarding lead, HSC Gateway, PSNI, NSPCC or an appropriate regulator where internal handling is unsafe, compromised or ineffective.
- No retaliation: PathwayX will not penalise a person who raises a genuine concern in good faith, even if it is not substantiated.

After an incident, PathwayX considers immediate improvements, support, supervision, training, risk controls, data handling and whether other children or partners may be affected. Learning is recorded without disclosing confidential details unnecessarily.

Monitoring, approval and review

The Director reviews this policy at least annually and sooner after a safeguarding incident, complaint, near miss, legal or guidance change, new service, new technology, insurer requirement or material organisational change. The review considers feedback from children, schools, parents/carers and personnel where appropriate.

Control	Requirement
Version	1.0



Control	Requirement
Policy owner	Ben Glasgow, Founder & Director
Designated Safeguarding Lead	Ben Glasgow
Issue date	4 August 2026
Next scheduled review	No later than 4 August 2027
Early review triggers	Incident, complaint, near miss, new delivery model, law/guidance change, insurer requirement or safeguarding audit finding
Superseded versions	Retained securely and marked as superseded, with the reason for change recorded

Formal adoption

Approved by	Ben Glasgow, Director
Signature	
Date	4 August 2026
Next review confirmed	4 August 2027

Operational note: professional review by a Northern Ireland safeguarding specialist or solicitor is recommended before PathwayX begins unsupervised or high-risk direct work. This policy supports, but does not replace, role-specific legal advice, risk assessment, consent documentation, privacy notices, insurer confirmation or host-school procedures.



Appendix A - Quick response procedure

Immediate danger: Call 999. Take reasonable action to protect the child without putting others at risk. Then contact the host safeguarding lead and PathwayX DSL.

Stage	Action
Receive	Listen calmly. Take the child seriously. Do not promise secrecy or investigate.
Protect	Check immediate safety and urgent medical needs. Call 999 where necessary.
Report	Tell the DSL and host Designated Teacher immediately/on the same day. If either is implicated, use the alternative route.
Record	Write exact words and factual observations, dates/times, people present, questions, actions and advice. Sign and date.
Refer	DSL/Designated Teacher contacts HSC Gateway and/or PSNI where threshold may be met. Confirm who is making the referral.
Follow up	Record the decision, reference, actions, support, information sharing and any escalation.

If the concern is about Ben Glasgow / the PathwayX DSL

- Do not report first to the implicated person.
- Contact the host school's Designated Teacher.
- Contact HSC Gateway and/or PSNI directly if harm or risk may exist.
- Preserve records and obtain independent safeguarding/legal advice.

Essential contacts

Contact	How to use
Emergency services	999 - immediate danger, serious injury or crime in progress
PSNI	101 - non-emergency police advice/reporting
HSC Trust Gateway Services	Use the Gateway team for the area where the child lives; current details are linked in the sources section
NSPCC Helpline	0808 800 5000 - advice for adults concerned about a child
Childline	0800 1111 - confidential support for children and young people
PathwayX DSL	Ben Glasgow - pathwayx.coaching@gmail.com



Appendix B - Safeguarding concern record

Complete as soon as possible. Record facts and exact words. Do not investigate. Send securely to the DSL/alternative safeguarding route on the same day.

Child / young person's name	
Date of birth / age / year group	
School / organisation	
Parent/carer details, if known	
Date, time and place of concern	
Date and time reported	
Person completing this form	
Role and contact details	
Others present / witnesses	

What was seen, heard or disclosed

Use the child's exact words in quotation marks. Separate what you observed from what another person said.

Questions or prompts used and responses



Safeguarding concern record - continuation

Immediate safety / medical action	
Reported to (name and role)	
Date and time of verbal report	
Referral / advice contact and reference	
Information shared and lawful reason	
Parent/carer informed? By whom / when / reason if not	
Outcome / next action / owner / deadline	

Additional facts, decision and reasons

Reporter signature	
Date / time	
DSL review and signature	
Date / time	
Follow-up review date	

Secure handling: Do not save this form in ordinary mentoring notes or send it through unapproved personal channels. Store it in the child's separate safeguarding file with access restricted and logged.



Appendix C - Pre-delivery safeguarding checklist

Complete for each school, programme or material change in delivery. Retain with the activity risk assessment.

Done	Safeguarding control
☐	Host safeguarding contact and deputy identified; procedure received/read
☐	Participant age range, numbers, additional needs and supervision agreed
☐	Roles, AccessNI eligibility/checks, references, induction and training confirmed
☐	Venue/room is observable, accessible and suitable; arrival/departure controlled
☐	One-to-one arrangements authorised, visible and recorded
☐	Online platform, accounts, permissions, privacy and recording settings approved
☐	Parental/young-person information and consent responsibilities agreed
☐	Photography/video/testimonial permissions and non-consent identification agreed
☐	Attendance, emergency, first-aid, missing child and collection arrangements agreed
☐	Data controller/processor roles, privacy notice, storage, access and retention agreed
☐	Activity/venue/online risks assessed; mitigations and responsible owners recorded
☐	Insurance cover and any host contractual requirements confirmed
☐	Personnel/guest speaker briefing completed; code of conduct acknowledged
☐	Reporting form and current Gateway/PSNI/NSPCC contacts available

School / programme	
Delivery date(s)	
PathwayX lead	
Host safeguarding contact	
Outstanding action / owner / deadline	
Completed by / date	
DSL approval / date	



Appendix D - Photography and video consent form

This template must be tailored to the specific activity and used alongside the privacy notice and host-school process. Do not rely on attendance as consent.

Activity / event	
Date and location	
Child / young person's name	
School / organisation	
PathwayX contact	pathwayx.coaching@gmail.com

What PathwayX proposes to capture and why

Please mark each permission separately

Choice	Proposed use
☐ Yes ☐ No	Still photographs for internal programme records/evaluation
☐ Yes ☐ No	Still photographs for PathwayX website or social media
☐ Yes ☐ No	Video/audio for internal programme records/evaluation
☐ Yes ☐ No	Video/audio for PathwayX website or social media
☐ Yes ☐ No	Anonymous written feedback/testimonial
☐ Yes ☐ No	Named written feedback/testimonial (specify name format below)

PathwayX will not normally publish a child's full name alongside an image, will not use images for unrelated purposes, and will store material securely for the stated retention period. Consent may be withdrawn for future use by contacting PathwayX. PathwayX will act as soon as reasonably practicable, but may not be able to recall material already printed or independently reshared; this will be explained for the specific campaign.

Parent/carer name (where required)	
Relationship / parental responsibility	
Parent/carer signature / date	
Young person's signature / date	
Name format permitted, if any	
Specific restrictions / safety requirements	
PathwayX/host approval and date	



Appendix E - Staff acknowledgement

This acknowledgement applies to employees, contractors, mentors, speakers, volunteers and anyone delivering or representing PathwayX around children.

- I have read and understood the PathwayX Child Protection & Safeguarding Policy and relevant host procedures.
- I understand that the welfare of the child takes priority and that I must report concerns on the same day.
- I will not investigate, promise secrecy, use unapproved private communications or form inappropriate relationships with a child.
- I will maintain professional boundaries, follow photography/data rules and report low-level concerns, allegations and mistakes.
- I confirm that information provided during recruitment and vetting is accurate and that I will promptly disclose relevant changes.
- I understand that breaches may lead to removal, disciplinary or contractual action and referral to statutory or vetting authorities.

Full name	
Role / organisation	
AccessNI level/date/reference (if applicable)	
Safeguarding induction completed	
Host-procedure briefing completed	
Signature	
Date	
Reviewed by	

Questions, limitations or conflicts to declare

Duty to update: This is a continuing obligation. Tell the PathwayX DSL promptly if your role, circumstances, police/disciplinary status or ability to comply changes.



Legal and good-practice sources

This policy was prepared for Northern Ireland and checked against the following sources available on 30 July 2026. Hyperlinks are included for updating and annual review.

- [The Children \(Northern Ireland\) Order 1995](#)
- [The Safeguarding Vulnerable Groups \(Northern Ireland\) Order 2007](#)
- [Safeguarding Board Act \(Northern Ireland\) 2011](#)
- [Sexual Offences \(Northern Ireland\) Order 2008](#)
- [Department of Health - Co-operating to Safeguard Children and Young People in Northern Ireland](#)
- [Department of Education - Safeguarding and Child Protection in Schools: A Guide for Schools \(September 2024\)](#)
- [Department of Education Circular 2025/06 - AccessNI checks and safer recruitment](#)
- [nidirect - Reporting child abuse and neglect / HSC Gateway contacts](#)
- [ICO - Children and the UK GDPR](#)
- [ICO - Taking photographs: data protection advice for schools](#)
- [ICO - Personal data breaches: a guide](#)
- [Volunteer Now - Keeping Children Safe: Our Duty to Care](#)
- [NSPCC Learning - Writing safeguarding policies and procedures](#)
- [NSPCC Learning - Child protection records retention and storage guidance](#)
- [NSPCC Learning - Photographing and filming children](#)

External contacts

Service	Contact
Emergency services	999
PSNI non-emergency	101
NSPCC Helpline	0808 800 5000 help@nspcc.org.uk
Childline	0800 1111
HSC Trust Gateway	Use the current nidirect Gateway contact page for the area where the child lives
PathwayX DSL	Ben Glasgow pathwayx.coaching@gmail.com

Legal note: safeguarding and data-protection requirements depend on the facts, the role and the delivery model. Current statutory guidance, host-school procedures, AccessNI eligibility advice, insurer requirements and specialist legal advice should be checked before adoption and whenever services change.