

MCR Pathways Safeguarding and Child Protection Policy
 incorporating
 Adult Safeguarding

Document Information	
Version	1.0
Owner	Designated Safeguarding Leads
Approved By and Date	Chief Executive: Sharon McIntyre <i>Sharon McIntyre 23.9.26</i>
Approved By and Date	Board of Trustees: Chair & Safeguarding Trustee Maureen McKenna <i>Maureen McKenna 29.9.26</i>
Applies To	All staff, volunteer mentors, trustees, contractors, agency workers, students and placement staff and others acting on behalf of MCR Pathways
Review Cycle	Annually - September
Next Review Date	September 2027
Classification	Internal Policy

MCR PATHWAYS DESIGNATED SAFEGUARDING LEADS AND SAFEGUARDING COMMITTEE MEMBERS

Each Head of Region is a trained MCR Pathways Designated Safeguarding Lead for their area. The Development Director provides UK wide safeguarding escalation and chairs the Safeguarding Committee.

Region	Name	MCR Pathways role	Email Address	Phone Number
England	Kerry Fellowes	Head of Region (England)	kerry.fellowes@mcrpathways.org	07710 564186
Scotland	Natalie Smith	Head of Region (East and South East Scotland)	natalie.smith@mcrpathways.org	07483 331289
Scotland	Frazer Brown	Head of Region (West and South West Scotland)	frazer.brown@mcrpathways.org	07483 330963
Scotland	Gavin Jardine	Head of Region (North Scotland)	gavin.jardine@mcrpathways.org	07483 331129
Escalation UK wide	Caroline Maddocks	Development Director Chair of Safeguarding Committee	caroline.maddocks@mcrpathways.org	07967 507111

Table of Contents

Page No

1. How Safeguarding Works at MCR Pathways	3
2. Safeguarding Policy Statement	4
3. Introduction and Ethos	4
4. Recognising Concerns, Managing Disclosures and Reporting Safeguarding Concerns	7
5. Legislative Framework	14
6. Roles and Responsibilities	18
7. Safer Recruitment and Professional Standards of Conduct	26
8. Adult Safeguarding	29
9. Prevent, Radicalisation and Extremism	31
10. Safe Digital Practice	32
11. Emerging Risks	34
12. Training, Governance and Quality Assurance	34
 Appendix 1 – Contact Details for Safeguarding in Participating Local Authorities	 37
Appendix 2 – Codes of Conduct	38
Appendix 3 - Key Supporting Documents	38

Distribution

This policy applies to everyone working for or on behalf of MCR Pathways, including:

- Trustees
- Employees
- Volunteer Mentors
- Pathways Coordinators / Setting Delivery Leads
- Agency Workers
- Contractors
- Consultants
- Students and Placement Staff
- Visitors involved in programme delivery

Managers are responsible for ensuring that staff understand this policy and complete the required safeguarding training.

This policy must be read alongside the safeguarding policy and procedures of the school, college, community organisation or other setting in which MCR Pathways activity is taking place.

1. How Safeguarding Works at MCR Pathways

MCR Pathways provides relationship based mentoring and associated programme activities for young people across schools, further education colleges and community settings in England and Scotland. Our work is delivered in partnership with education providers, local authorities and other organisations.

Safeguarding is not solely the responsibility of MCR Pathways Designated Safeguarding Leads. Everyone working for or on behalf of MCR Pathways, including trustees, employees, volunteer mentors, contractors, agency workers, students, placement staff and others acting on our behalf, has a responsibility to recognise and report safeguarding concerns in accordance with this policy.

Direct interaction with young people through MCR Pathways programmes is undertaken by Pathways Coordinators and volunteer mentors. Through the trusted relationships they develop, they may become aware of safeguarding concerns or receive disclosures. Other MCR Pathways staff, trustees, contractors and others working on behalf of MCR Pathways may have a more indirect role but must remain alert to safeguarding concerns and follow the reporting arrangements set out in this policy.

Where MCR Pathways delivers within a school, college or partner setting, the host organisation retains its own safeguarding responsibilities and procedures. MCR Pathways does not replace the safeguarding responsibilities of the setting. MCR Pathways staff and volunteer mentors must follow the safeguarding arrangements of the setting in which they are working, as well as this policy.

MCR Pathways retains responsibility for safeguarding within its own organisation. This includes safer recruitment and vetting, safeguarding training, professional boundaries, the conduct of MCR Pathways staff and volunteer mentors, responding to allegations or concerns relating to

people working on behalf of MCR Pathways, organisational safeguarding oversight, and appropriate recording, escalation and learning.

Before delivery begins, MCR Pathways and the partner setting will establish clear safeguarding arrangements, including a named safeguarding contact, reporting routes, relevant local procedures, arrangements for sharing safeguarding information, and how concerns or allegations relating to MCR Pathways staff or volunteer mentors will be managed.

Where MCR Pathways delivers activity outside an education setting, the safeguarding arrangements for that activity must be agreed in advance. Where another organisation is hosting or jointly delivering the activity, its safeguarding procedures will operate alongside this policy. Where MCR Pathways is solely responsible for the activity, MCR Pathways safeguarding procedures will apply, together with relevant local statutory safeguarding arrangements.

No one should assume that reporting a concern to a partner organisation removes MCR Pathways' own responsibility to act. Where responsibilities overlap, organisations should communicate and work together, with the safety and welfare of the child, young person or adult at risk as the primary consideration.

2. Safeguarding Policy Statement

Safeguarding is fundamental to the mission and values of MCR Pathways and involves promoting the welfare of children and protecting them from harm, including maltreatment and health impairment. It ensures children grow up in safe environments and enables them to achieve the best outcomes. MCR Pathways emphasises that no one involved in our work should experience abuse, and everyone shares responsibility for promoting welfare and creating a safe culture.

MCR Pathways has a zero tolerance approach to racism, discrimination, prejudice and hate related behaviour and recognises the harm that such behaviour can cause. Racist, discriminatory, prejudicial and hate related behaviour are safeguarding concerns and will be responded to in accordance with this policy. Appropriate safeguarding action, including escalation or referral, will be taken where required.

The MCR Pathways Safeguarding and Child Protection Policy sets out our commitment to creating and maintaining a safe, inclusive and respectful environment for the children and young people with whom we work. It outlines our legal, moral and professional responsibilities and provides a framework for recognising, responding to and reporting concerns. This policy brings together MCR Pathways' safeguarding principles, responsibilities and procedures, including the expectations placed on staff, volunteer mentors, trustees, contractors and others working on behalf of the organisation. It reflects relevant legislation, statutory guidance and recognised safeguarding practice across England and Scotland.

3. Introduction and Ethos

This policy establishes the minimum safeguarding standards expected throughout the organisation.

It should be read alongside:

- Local Authority safeguarding procedures [See Appendix 1 for links to Local Authorities](#)
- Safeguarding and Child Protection policies and procedures of the relevant school, college or other partner setting
- Relevant national legislation and statutory guidance
- Organisational policies including Whistleblowing, Recruitment, Data Protection and Health & Safety
- Staff Code of Conduct, Mentor Code of Conduct and Volunteer Agreement

3.1 Purpose of this Policy

The purpose of this policy is to:

- protect children, young people and adults at risk from harm
- provide practical safeguarding guidance
- define organisational responsibilities
- support lawful and consistent decision making
- ensure concerns are reported promptly
- promote effective partnership working
- ensure compliance with safeguarding legislation and statutory guidance.

3.2 Scope

This policy applies to anyone acting on behalf of MCR Pathways, regardless of employment status.

It includes all activities undertaken by the organisation including:

- School delivery settings
- Further / Higher Education delivery settings
- Community based delivery settings
- Mentoring
- Group work /Preparing for mentoring
- Talent Taster activities
- Digital communication and virtual or hybrid delivery
- Events
- Partnership activity

Every individual is expected to comply with this policy whenever representing MCR Pathways.

3.3 Definition of Safeguarding

For the purposes of this policy, a child is anyone under the age of 18.

In England, Working Together to Safeguard Children 2026 defines safeguarding and promoting the welfare of children as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development

- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

In Scotland, child protection practice is guided by the National Guidance for Child Protection in Scotland, alongside GIRFEC and relevant Scottish legislation.

Child protection is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

3.4 Creating a Safe Culture

A positive safeguarding culture is built on prevention as well as response.

MCR Pathways will:

MCR Pathways Commitments
Recruit safely
Provide appropriate safeguarding training, refreshed and updated at regular intervals
Establish clear professional boundaries
Encourage speaking up
Support whistleblowing
Promote equality and inclusion
Assess and manage safeguarding risks
Continuously review safeguarding practice

Everyone acting on behalf of MCR Pathways has both the authority and the responsibility to raise concerns where they believe a child or adult at risk may be experiencing, or at risk of harm.

No person will be disadvantaged for reporting safeguarding concerns in good faith.

Workplace bullying is not tolerated within MCR Pathways. Concerns should normally be raised with the individual's line manager in the first instance, with reference to the relevant organisational policy, including the Whistleblowing Policy where appropriate.

3.5 Safeguarding Across Our Programmes

Programme Area	Safeguarding Framework/Key Activities
Group work / Preparation for mentoring	Supports development of emotional wellbeing, resilience, healthy relationships, personal safety, respect for others, and confidence to seek help. Sessions are delivered in safe, supportive environments.
Mentoring	Delivered within a structured framework including: safer recruitment, appropriate safeguarding checks, training, clear professional boundaries, ongoing supervision and monitoring. Where mentoring takes place within a partner setting, volunteer mentors follow the safeguarding arrangements explained at induction and report concerns through the agreed safeguarding route
Talent Taster Activities	Workplace experiences including: employer suitability checks, risk assessments, safeguarding expectations for employers, supervision arrangements, and clear reporting procedures.
Partnership Working	Where mentoring takes place within a partner setting, volunteer mentors follow the safeguarding arrangements explained at induction and report concerns through the agreed safeguarding route.

4. Recognising Concerns, Managing Disclosures and Reporting Safeguarding Concerns

4.1 Purpose

Every individual working, volunteering or otherwise acting on behalf of MCR Pathways has a responsibility to recognise safeguarding concerns and respond appropriately.

Safeguarding concerns must never be ignored, minimised or delayed. Early action can prevent further harm and ensure children, young people and adults at risk receive the support and protection they need.

This section outlines how concerns should be recognised, managed, recorded and reported.

4.2 Recognising Safeguarding Concerns

Safeguarding concerns may arise in many different ways. Concerns may be identified through:

- A direct disclosure from a child, young person or adult.
- Observed injuries or unexplained physical marks.
- Changes in behaviour or emotional wellbeing.
- Repeated absences or disengagement.
- Concerns raised by parents, carers or professionals.
- Information shared by another child or young person.
- Online activity or digital communications.
- Patterns of low-level concerns which, when viewed together, indicate increasing risk.

Keep an open and inquisitive mind, always ask yourself if a child or young person's situation or actions indicate a need for further help.

It is vital that children and young people can speak out about abuse and that they are taken seriously. Adults should not wait for a direct disclosure before acting. Where there are indicators of distress, harm or concern, the concern should be reported promptly through the agreed safeguarding route.

Cause for Concern: Any observation, behaviour, or situation that raises doubts about a young person's safety, welfare, or well-being, suggesting potential abuse, neglect, or exploitation.

- **Disclosure:** The process by which a young person shares their experience. This can be direct (verbal statements), indirect (ambiguous statements), behavioural (signals that something is wrong), or non-verbal (letters, drawings).¹
- **Barriers:** Young people may hesitate to disclose due to shame, guilt, isolation, fear of consequences, lack of trust in adults, or not having the words to describe the abuse.

4.3 Types of Abuse

Abuse may occur in a family, educational, community, institutional or online environment. A child or young person may experience one or several forms of abuse simultaneously.

Forms of abuse include:

Type of Abuse	Key Characteristics	Common Signs
1. Physical Abuse	Hurting or harming a young person on purpose (hitting, kicking, shaking, poisoning).	Bruises, broken bones, burns, bite marks, seizures from poisoning.
2. Emotional Abuse	Continual emotional mistreatment; scaring, humiliating, isolating, or ignoring.	Lack of confidence, struggling to control emotions, behaviour outside expected developmental stages.
3. Sexual Abuse	Forced, tricked, or manipulated into sexual activities, in person or online.	Avoiding someone, sexual language/behaviour, self-harm, physical soreness/STIs.
4. Neglect	Ongoing failure to meet basic needs (food, clothing, healthcare, supervision).	Unwashed clothes, hunger, health/developmental concern.
5. Child Sexual Exploitation (CSE)	Sexual activity in exchange for gifts, money, or affection often involves grooming.	Unexplained gifts/money, secretive behaviour, sudden mood changes, physical abuse signs.
6. Female Genital Mutilation (FGM)	Deliberate alteration or removal of female genitals for non-medical reasons.	Difficulty walking/sitting, long absences from school, appearing anxious/depressed.

7. Bullying / Cyberbullying	Repeated behaviour meant to hurt someone physically or emotionally, often online. Concerns about bullying should be managed in line with the relevant setting's anti bullying procedures and, where there is a safeguarding concern, reported through the agreed safeguarding route.	Lost/damaged belongings, unexplained injuries, hesitation to attend school, sudden behaviour changes.
8. Criminal Exploitation	Manipulation into committing crimes (e.g., County Lines, drug dealing, theft).	Unexplained money, new slang, carrying weapons, absent from school/home.
9. Domestic Abuse	Violent or controlling behaviour between people in a relationship/family.	Aggression, anxiety, bed-wetting, attention seeking, trouble learning.
10. Child Trafficking	Moving children for exploitation (labour, sexual, crime, benefit fraud).	Household chores all day, rarely leaving home, prepared stories, workplace injuries.
11. Grooming	Building trust to manipulate and abuse; can happen over long periods.	Secretive about time online, older boyfriend/girlfriend, unexplained new items.
12. Online Abuse	Abuse via internet/devices (sexting, grooming, emotional abuse, bullying, negative use of Artificial Intelligence generated content).	Significant changes in time spent online, distress after receiving messages, secretive about contacts.

4.4 Additional Safeguarding Risks

MCR Pathways recognises that children and young people may also be at risk from a range of additional safeguarding concerns, including:

- Radicalisation and extremism (see Section 9 for further information)
- Discrimination, prejudice and hate related behaviour
- Harmful sexual behaviour
- Peer-on-peer abuse
- Serious violence
- Forced marriage
- Honour-based abuse
- Modern slavery and trafficking
- Missing education or repeated unexplained absence

Staff and volunteer mentors are not expected to determine whether these risks are present. Their responsibility is solely to recognise concerns and report them promptly.

4.5 Responding to a Disclosure

Who might a child or young person disclose to at MCR Pathways?

While anyone may be approached, direct programme contact with young people is through Pathways Coordinators / Setting Delivery Leads and volunteer mentors. Young people may therefore be most likely to disclose to:

- Pathways Coordinator / Setting Delivery Lead: Build trust through weekly group work/ preparing to mentor work, in Year 7-8/S1-S2 and ongoing contact throughout secondary school.
- Volunteer Mentors: Often seen as the 'one trusted adult' in a young person's life. They may receive disclosures or notice changes in wellbeing or behaviour and should report concerns through the agreed safeguarding route.

It is not the role of staff or mentors to investigate, seek proof, or evaluate the grounds for a concern; the priority is to report any concerns.

A disclosure may be planned or entirely unexpected.

When someone shares information indicating they may be at risk of harm, the response of the adult can have a significant impact on the outcome.

Responding to a Disclosure	
What to Do	What to Avoid
• Stay calm • Listen carefully without interruption • Allow the individual to speak freely • Reassure them that they have done the right thing • Explain confidentiality limits • Ask only necessary open questions • Report the concern immediately	• Ask leading or suggestive questions • Conduct your own investigation • Pressure for more information • Express disbelief, shock, or judgement • Promise secrecy • Contact alleged perpetrators • Delay reporting while gathering evidence

4.6 Immediate Risk

If a child, young person or adult is believed to be at immediate risk of serious harm:

- Take reasonable steps to ensure immediate safety.
- Contact the emergency services where necessary.
- Report the concern through the agreed safeguarding reporting arrangements as soon as possible.
- Record all actions taken.
- Continue to cooperate with statutory agencies.
- The safety of the individual always takes priority over organisational procedures.

4.8 Reporting Safeguarding Concerns

Every safeguarding concern must be reported without delay.

- Where MCR Pathways activity takes place within a school, further education college or community partner setting, staff and volunteer mentors must follow the safeguarding reporting arrangements agreed with that setting. Volunteer mentors must be made aware of these arrangements as part of their setting induction.
- If a volunteer mentor becomes concerned after leaving the setting, is unable to follow the agreed setting reporting route, or becomes aware of information that gives rise to a safeguarding concern outside the immediate mentoring session, they should contact their Pathways Coordinator / Setting Delivery Lead. If neither is available, they should contact an MCR Pathways Designated Safeguarding Lead.
- Where MCR Pathways activity takes place outside a partner setting, safeguarding concerns should be reported to the relevant Pathways Coordinator / Setting Delivery Lead, or directly to an MCR Pathways Designated Safeguarding Lead.
- If the usual safeguarding contact is unavailable, this must not delay reporting. Any MCR Pathways Designated Safeguarding Lead may be contacted.

No individual should delay reporting because they are uncertain whether abuse or harm has occurred. It is not the responsibility of staff or volunteer mentors to investigate or determine whether a safeguarding threshold has been met.

Reasonable concern is sufficient to justify making a safeguarding report.

4.9 Recording Safeguarding Concerns

Safeguarding concerns must be recorded as soon as possible in accordance with the agreed safeguarding arrangements for the setting and any applicable MCR Pathways record keeping requirements.

Safeguarding records should:

- Be completed as soon as possible after the concern arises.
- Contain factual information only.
- Clearly distinguish observation from opinion.
- Record the exact words used wherever possible.
- Include dates, times and locations.
- Record who the information was shared with and what actions were taken.
- Be signed and dated.
- Records should be objective, clear, legible and stored securely in accordance with organisational information governance procedures.

Where a partner setting is responsible for the safeguarding case record, MCR Pathways should retain an appropriate record of the concern and any actions relevant to its own safeguarding responsibilities, without unnecessarily duplicating detailed safeguarding information.

4.10 Information Sharing

Safeguarding information must be shared in accordance with the agreed safeguarding arrangements for the setting, MCR Pathways procedures and applicable information governance requirements.

Information Sharing Principle/Criteria	Description/Guidance
Necessary	Information sharing must be essential for the intended purpose of protecting an individual or fulfilling a legal obligation.
Proportionate	Only the information required for the specific safeguarding purpose should be shared.
Relevant	Shared data must be pertinent to the safeguarding concern being addressed.
Accurate	Information should be as accurate and up to date as possible. Facts, observations, opinions and information provided by others should be clearly distinguished.
Timely	Information should be shared promptly to ensure effective safeguarding intervention.
Secure	Data must be shared and stored using safe methods in accordance with information governance procedures.
Confidentiality Limit	Confidentiality must never prevent appropriate safeguarding information from being shared where this is necessary to protect an individual from harm

4.11 Referrals to External Agencies

Where appropriate, the relevant MCR Pathways Designated Safeguarding Lead or the safeguarding lead within the partner setting will make or coordinate referrals to:

- Children's Social Care in England or local authority social work services in Scotland
- Police
- Health services
- Adult safeguarding or adult protection services
- Other relevant statutory agencies.

Where a safeguarding concern or allegation relates to the conduct of a person working or volunteering with children in England, MCR Pathways will follow the relevant allegations management procedure and, where required, refer the matter to the Local Authority Designated Officer or designated officer team.

Where MCR Pathways activity takes place within a partner setting, referrals will normally be made through that setting's agreed safeguarding procedures. This does not prevent MCR Pathways from escalating a concern or making a direct referral where necessary to protect an individual.

Referrals should be made promptly where there is reasonable cause to believe that a child, young person or adult may be at risk of harm or where statutory safeguarding advice or intervention may be required.

4.12 Ongoing Support

Following a safeguarding concern, MCR Pathways will:

- Continue to support the child, young person or adult where appropriate, within MCR Pathways' role
- Co-operate fully with statutory agencies.
- Support staff or volunteer mentors affected by the incident.
- Maintain appropriate confidentiality
- Monitor ongoing safeguarding risks within MCR Pathways' remit
- Review safeguarding arrangements where necessary.

4.13 Escalation

If an individual believes that a safeguarding concern has not been managed appropriately, they have a responsibility to escalate the matter.

Escalation may include:

- Raising the concern again with the relevant MCR Pathways Designated Safeguarding Lead or safeguarding lead within the partner setting..
- Referring the matter to the Safeguarding Committee.
- Using the Whistleblowing Policy.
- Contacting statutory safeguarding agencies where immediate protection is required.

The Safeguarding Committee provides organisational oversight of safeguarding practice, including review of significant incidents, emerging themes, actions and learning. It does not replace immediate reporting to a partner setting or statutory agency and must not delay urgent safeguarding action.

Professional disagreement should never prevent action to safeguard a child, young person or adult at risk.

4.14 Learning and Continuous Improvement

Safeguarding concerns provide opportunities for organisational learning.

Following significant incidents, or where themes or learning are identified, MCR Pathways will:

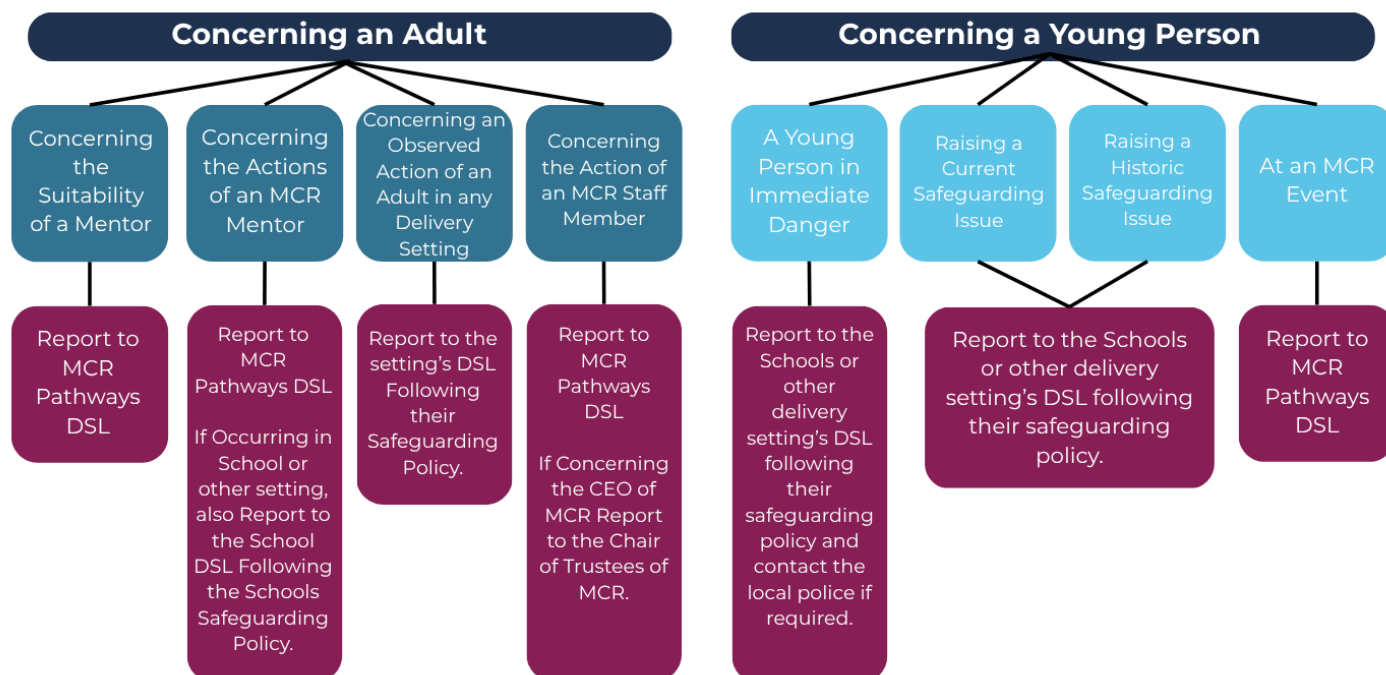
- Review the effectiveness of safeguarding procedures.
- Identify lessons learned.
- Update policies where necessary.
- Improve training and gu
- Share learning appropriately across the organisation.

4.15 Quick Reference

Whenever a safeguarding concern arises:

- **Recognise** the signs or receive the disclosure.
- **Respond** calmly and appropriately.
- **Reassure** without making promises of secrecy.
- **Record** the facts accurately and promptly.
- **Report** immediately through the agreed safeguarding route
- **Refer** to statutory agencies where required.
- **Review** and continue to support the individual as appropriate.

Safeguarding and Child Protection Concern Reporting Flowchart



4.16 Key Principle

If you are concerned about the safety or wellbeing of a child, young person or adult, do not wait for certainty.

It is always better to report a genuine concern that proves unfounded than to fail to act when someone may be at risk of harm. Prompt reporting, accurate recording and timely referral are essential components of effective safeguarding practice.

5. Legislative Framework

5.1 Purpose

MCR Pathways is committed to meeting all legal and statutory safeguarding responsibilities in England and Scotland. This policy is underpinned by current legislation, statutory guidance and recognised safeguarding best practice.

The legislative framework establishes the standards relevant to MCR Pathways' work with children and young people, and its responsibilities where adult safeguarding concerns arise. This provides the foundation for the organisation's safeguarding arrangements.

All staff, volunteer mentors and trustees must understand that safeguarding is a shared responsibility, supported by legal, statutory and organisational duties.

5.2 Guiding Principles

The organisation will ensure that safeguarding arrangements:

- Place the welfare of children and young people at the centre of all decision making;
- Promote early identification and intervention where concerns arise;
- Support partnership working with statutory agencies;
- Recognise that safeguarding is everyone's responsibility;
- Comply with relevant legislation in the nation where services are delivered;
- Are reviewed whenever legislation or statutory guidance changes.

5.3 England

Category	Details/Documents
Principal Legislation	• Children Act 1989 • Children Act 2004, • Children and Social Work Act 2017
Key Statutory Guidance	• Keeping children safe in education 2026 • Working together to safeguard children 2026 • Children's social care national framework • Disqualification under the Childcare Act 2006 • Relevant Department for Education safeguarding advice
Summary of Expectations	These documents establish expectations relating to protecting children and young people from abuse and neglect, multi agency safeguarding responsibilities, information sharing, safer recruitment, child centred practice, safeguarding governance and the responsibilities of education providers.

MCR Pathways aligns its safeguarding practice in England with applicable legislation and statutory guidance and, when working in schools and colleges, with the safeguarding arrangements of those partner settings.

5.4 - Scotland

Category	Details/Documents
Principal Legislation	• Children (Scotland) Act 1995 • Children and Young People (Scotland) Act 2014 • United Nations Convention on the Rights of the Child (Incorporation) (Scotland) Act • Protection of Vulnerable Groups (Scotland) Act 2007 • Disclosure (Scotland) Act 2020 • Adult Support and Protection (Scotland) Act 2007
National Guidance	• National guidance for child protection in Scotland • Getting It Right for Every Child GIRFEC • Children's Services Planning Guidance statutory guidance on children's services planning (Scottish Government, 2020). • The Promise Scotland Plan 24-30
Framework Principles	These frameworks promote: early intervention; multi-agency collaboration; children's rights; wellbeing; proportionate information sharing; and child-centred decision making.

MCR Pathways aligns its safeguarding practice in Scotland with applicable legislation and national guidance and, when working within partner settings, with the safeguarding arrangements of those settings

[See Appendix 3 - Key Supporting Documents for further information](#)

5.5 Multi-Agency Working

Safeguarding cannot be delivered by one organisation alone.

MCR Pathways will work in partnership with:

- Local Authorities
- Schools further education colleges and community partner settings
- Police
- Health Services
- Children's Social Care in England and local authority social work services in Scotland
- Child Protection Committees in Scotland
- Integrated Care Boards in England
- Third Sector Organisations
- Other statutory safeguarding partners

Where concerns arise, information will be shared lawfully, proportionately and in accordance with safeguarding legislation and local safeguarding procedures.

5.6 Local Safeguarding Procedures

MCR Pathways staff and volunteer mentors working within schools, further education colleges, community settings or local authority services must follow the safeguarding arrangements agreed with that setting, alongside this policy.

This may include:

- The safeguarding and child protection policy and procedures of the delivery setting.
- Local Authority safeguarding procedures.
- Local referral pathways.
- The reporting and escalation arrangements of the relevant setting.

Following local safeguarding procedures does not remove MCR Pathways' responsibility to respond to concerns relating to its own staff, volunteer mentors, activities or organisational practice.

5.7 Organisational Compliance

MCR Pathways will ensure that:

- Safeguarding policies remain aligned with current legislation and statutory guidance
- Policies are reviewed at least annually
- Legislative changes are implemented promptly
- Staff receive regular safeguarding updates
- Trustees receive assurance regarding safeguarding compliance
- Safeguarding arrangements are monitored through governance processes
- Legislation will be reviewed whenever significant statutory guidance is issued

5.8 Equality, Diversity and Human Rights

Category	Details
Safeguarding Commitments	Equality, Diversity, Inclusion, Dignity, Respect, Children's rights
Protected Characteristics	Age, Disability, Gender Reassignment, Marriage and Civil Partnership, Pregnancy and Maternity, Race, Religion or Belief, Sex, Sexual Orientation
Other relevant factors	Socioeconomic background and other circumstances which may increase vulnerability to harm or discrimination

MCR Pathways regards discrimination, prejudice and hate related behaviour as safeguarding concerns and will respond to them in accordance with this policy. Where such behaviour causes, or may indicate, harm or risk to a child, young person or adult at risk, appropriate safeguarding action will be taken, including escalation or referral where required.

5.9 Review of Legislative Compliance

The Designated Safeguarding Leads will:

- Monitor legislative developments across England and Scotland
- Review this policy annually
- Recommend amendments where legislation changes
- Communicate significant updates to staff and volunteers
- Provide assurance to the Board of Trustees that safeguarding arrangements remain compliant.

Key Principle

Compliance with safeguarding legislation is the minimum standard expected of MCR Pathways. MCR Pathways is committed not only to meeting statutory requirements but to promoting a culture in which safeguarding is embedded within every decision, every programme and every interaction with children and young people, and in its response to any adult safeguarding concern arising in connection with its work.

6. Roles and Responsibilities

6.1 Purpose

Effective safeguarding depends upon clear leadership, defined responsibilities and organisational accountability.

While Designated Safeguarding Leads (DSLs) coordinate safeguarding arrangements, responsibility for safeguarding rests with every individual working, volunteering or otherwise acting on behalf of MCR Pathways

Everyone working or volunteering for or on behalf of MCR Pathways has a responsibility to recognise safeguarding concerns, report them through the appropriate safeguarding route and contribute to a culture where safeguarding is everyone's responsibility.

6.2 Organisational Accountability

Ultimate responsibility for safeguarding rests with the Board of Trustees.

The Chief Executive has overall executive responsibility for safeguarding.

The Development Director leads safeguarding across MCR Pathways, provides UK wide safeguarding escalation and chairs the Safeguarding Committee. The Development Director works with the regional Designated Safeguarding Leads to provide safeguarding leadership, oversight, advice and escalation across the organisation.

Day to day safeguarding responsibilities are delivered through the Designated Safeguarding Leads, Senior Management Team and managers in accordance with their respective roles and responsibilities.

Every manager is responsible for ensuring safeguarding standards are maintained within their area of responsibility.

No member of staff, volunteer mentor or other person working on behalf of MCR Pathways is exempt from safeguarding responsibilities.

6.3 Board of Trustees

Responsibility Area	Action / Description
Policy & Oversight	Approve and review safeguarding policies and ensure appropriate governance.
Performance Monitoring	Receive regular assurance reports and monitor compliance with relevant safeguarding duties and requirements
Risk & Resources	Oversee organisational risks and ensure sufficient resources are available.
Continuous Improvement	Support improvement and ensure learning from incidents is embedded into practice.

The Chair of the Board of Trustees also holds the role of Safeguarding Trustee and provides independent oversight and assurance on safeguarding matters. This does not remove the collective safeguarding responsibility of the Board.

6.4 Chief Executive

The Chief Executive has overall executive responsibility for safeguarding.

Responsibility Area	Action / Description
Implementation	Ensure safeguarding arrangements are effectively implemented.
Culture	Promote a positive safeguarding culture.
Compliance	Ensure organisational compliance with safeguarding legislation.
Resources	Ensure sufficient resources are available to support effective safeguarding.
Risk Management	Ensure safeguarding risks are appropriately managed.

Responsibility Area	Action / Description
Performance Monitoring	Receive regular safeguarding performance information.
Reporting	Report safeguarding performance to the Board of Trustees.
Improvement	Support continuous organisational improvement.

Where delegated, the Chief Executive remains accountable for ensuring safeguarding responsibilities are discharged effectively.

6.5 Safeguarding Committee

The Safeguarding Committee is comprised of all MCR Pathways Designated Safeguarding Leads and provides organisational oversight and assurance of safeguarding across MCR Pathways. It is chaired by the Development Director. Membership is set out at the beginning of this policy.

Responsibility Area	Action / Description
Safeguarding Oversight	Monitor safeguarding practice and performance across MCR Pathways
Incident and Trend Review	Review significant safeguarding incidents, themes and emerging trends
Policy and Compliance	Oversee safeguarding policy development and monitor organisational compliance
Risk and action monitoring	Review safeguarding risks and monitor completion of agreed safeguarding actions
Quality Assurance	Support safeguarding audits, reviews and quality assurance activity
Organisational Learning	Identify and share learning from safeguarding concerns, incidents and reviews
Advice and assurance	Provide safeguarding advice to the Chief Executive and assurance to the Board of Trustees

Safeguarding concerns must first be managed through the reporting and escalation routes set out in this policy. Matters may be brought to the Safeguarding Committee where organisational

oversight, cross organisational action, learning or assurance is required. The Committee will record decisions and actions, identify responsible owners and monitor completion.

The Committee's collective oversight role does not replace the individual operational responsibilities of its members as Designated Safeguarding Leads, nor the responsibilities of safeguarding leads within partner settings or statutory agencies. Committee consideration must never delay urgent safeguarding action.

6.6 Designated Safeguarding Leads (DSLs)

Designated Safeguarding Leads are responsible for coordinating safeguarding arrangements across MCR Pathways.

Responsibility Area	Action / Description
Case Management	Receive and assess safeguarding concerns referred to MCR Pathways and advise on appropriate action
Referrals	Make or support referrals to statutory agencies where MCR Pathways is responsible for doing so, and escalate concerns where appropriate
Records	Maintain appropriate MCR Pathways safeguarding records
Support & Guidance	Support staff and volunteer mentors and provide safeguarding advice
Monitoring	Monitor safeguarding practice and review procedures.
Training	Monitor safeguarding training compliance and support safeguarding learning.
Partnerships	Maintain professional relationships with external safeguarding partners.
Learning	Contribute to organisational learning following safeguarding concerns and incidents.

Where a safeguarding concern is referred to MCR Pathways or falls within MCR Pathways' responsibilities, Designated Safeguarding Leads will ensure that it is responded to promptly, proportionately and in accordance with this policy and applicable safeguarding guidance.

6.7 Managers

Managers play a critical role in embedding safeguarding into everyday practice.

Responsibility Area	Action
Working Practices	Promote safe working practices
Staff Awareness	Ensure staff understand their safeguarding responsibilities
Compliance	Monitor safeguarding compliance within their area of responsibility
Reporting	Encourage prompt reporting of concerns through the agreed safeguarding route
Staff Support	Support staff following safeguarding incidents.
Training	Ensure mandatory safeguarding training is completed.
Escalation	Ensure safeguarding concerns are escalated appropriately where required
Quality Assurance	Contribute to safeguarding audits and reviews

Managers are responsible for creating environments where staff feel confident to speak up and raise safeguarding concerns.

6.8 Employees

Every employee shares responsibility for safeguarding.

Responsibility Area	Action
Welfare	Promote the welfare of children, young people and adults at risk
Compliance	Understand and comply with this policy and, where relevant, the agreed safeguarding arrangements of the setting in which they are working
Training	Complete mandatory safeguarding training promptly
Awareness	Recognise indicators of abuse, neglect or other safeguarding concerns, including adult

Responsibility Area	Action
	safeguarding concerns where these arise.
Conduct	Maintain professional boundaries
Reporting	Report safeguarding concerns promptly through the agreed safeguarding route
Documentation	Record safeguarding information accurately where this forms part of their role or reporting responsibility
Cooperation	Cooperate with safeguarding investigations undertaken by appropriate agencies
Confidentiality	Maintain confidentiality appropriately
Culture	Contribute to a positive safeguarding culture

Employees must never assume that someone else will report a safeguarding concern.

6.9 Volunteer Mentors

Volunteer mentors develop trusted relationships with young people and may receive disclosures or notice changes in wellbeing or behaviour.

Volunteer mentors must:

Responsibility Area	Action / Requirement
Safeguarding Training	Complete safeguarding training before working with young people
Reporting Procedures	Understand and follow the safeguarding arrangements explained at induction for the setting in which they are mentoring
Professional Boundaries	Maintain professional boundaries
Investigation	Avoid investigating concerns or seeking proof

Responsibility Area	Action / Requirement
Reporting Concerns	Report concerns without delay through the agreed safeguarding route
Ongoing Learning	Participate in ongoing safeguarding updates where required.

Volunteer mentors are not responsible for determining whether abuse or harm has occurred. Their responsibility is to recognise concerns, respond appropriately and report them without delay.

6.10 Pathways Coordinators / Setting Delivery Leads

Pathways Coordinators / Setting Delivery Leads are central to safeguarding within programme delivery.

Responsibility Area	Action
Relationships	Maintain safe relationships with young people
Mentoring Support	Support volunteer mentors to understand and follow safeguarding requirements
Safeguarding Concerns	Receive safeguarding concerns where appropriate and ensure they are reported or escalated through the agreed safeguarding route
Partnerships	Liaise with the safeguarding lead within the relevant school, further education college or community partner setting
Recording	Ensure relevant MCR Pathways safeguarding information is recorded in accordance with agreed procedures
Multi-agency Working	Support multi-agency working
Awareness	Promote safeguarding awareness throughout programme delivery

Where programmes are delivered within schools, further education colleges or community partner settings, Pathways Coordinators / Setting Delivery Leads must follow the safeguarding arrangements agreed with that setting, alongside this policy.

6.11 Contractors, Consultants and Visitors

Anyone [working, volunteering or otherwise acting on behalf of MCR Pathways](#) is expected to uphold safeguarding standards.

Responsibility Area	Action / Requirement
Compliance	Comply with safeguarding requirements relevant to their role.
Operational	Follow agreed operational and safeguarding instructions
Reporting	Report safeguarding concerns through the agreed safeguarding route
Professionalism	Maintain appropriate professional conduct.
Collaboration	Work within agreed safeguarding arrangements.

Where required, appropriate safeguarding checks must be completed before work commences.

6.12 Young People

Young people should be supported to understand how to seek help and raise concerns. Responsibility for safeguarding remains with the adults and organisations working with them.

Area	How MCR Pathways supports young people
Communication	Encourage young people to speak openly about concerns
Support	Encourage young people to seek support from a trusted adult, where they need it
Environment	Support young people to contribute to safe and respectful environments
Behaviour	Promote respectful behaviour towards others
Reporting	Provide clear information about how to raise concerns relating to MCR Pathways activity
Culture	Encourage young people to contribute to positive programme cultures

Young people's voices should always be listened to and taken seriously.

7. Safer Recruitment and Professional Standards of Conduct

7.1 Purpose

MCR Pathways is committed to recruiting, selecting and retaining individuals who are suitable to work with children, young people and adults.

Safer recruitment is a key safeguarding measure that helps prevent unsuitable individuals from gaining access to children, young people and adults. It is supported by clear professional standards, robust induction processes, ongoing supervision and mandatory safeguarding training.

Every person representing MCR Pathways is expected to uphold the highest standards of integrity, professionalism and conduct. [See Appendix 2 for Codes of Conduct](#)

7.2 Principles of Safer Recruitment

The organisation will ensure that recruitment processes are:

- Fair and transparent
- Consistent and proportionate
- Compliant with relevant legislation
- Focused on safeguarding and child protection
- Designed to identify and deter unsuitable applicants
- Recruitment decisions will always place the safety and wellbeing of children and young people above all other considerations

7.3 Recruitment Procedures

Before appointment, MCR Pathways will normally complete appropriate pre-employment checks, including:

- Verification of identity
- Confirmation of the right to work where applicable
- Verification of qualifications relevant to the role
- Employment history checks
- Professional references
- Appropriate criminal record and safeguarding checks
- Confirmation of any professional registration where required

No individual should begin regulated activity until all required safeguarding checks have been satisfactorily completed, unless a documented risk assessment and organisational procedure permit otherwise.

7.4 Criminal Record Checks

Where roles involve regulated activity or regular contact with children or vulnerable adults, appropriate disclosure checks will be undertaken in accordance with the legal requirements of England (Disclosure and Barring Service - DBS) or Scotland (Protecting Vulnerable Groups Scheme - PVG).

These checks form one part of a wider safer recruitment process and do not replace ongoing supervision, professional judgement or safeguarding vigilance.

7.5 Recruitment Of Volunteers

Category	Principle / Requirement	Action / Standard	Notes
Volunteer Mentor Recruitment	Volunteer mentors are subject to robust safeguarding standards appropriate to their role.	• Complete recruitment process. • Provide references. • Complete required safeguarding checks. • Attend training. • Receive induction. • Comply with policies.	Ongoing supervision and support throughout involvement.
Induction	All new staff and volunteer mentors receive an induction covering key organisational areas.	• Safeguarding Policy. • Reporting procedures. • Professional boundaries. • Code of Conduct. • Whistleblowing. • EDI. • Health & Safety. • Role-specific duties. • Where relevant, safeguarding arrangements for the setting in which they will be working	No unsupervised work until induction and safeguarding training are complete.
Training Standards	Mandatory safeguarding training for all personnel.	• Appropriate to the role. • Delivered promptly. • Refreshed at appropriate intervals. • Legislative updates.	Maintained records for compliance monitoring.
Additional Training	Targeted training for specific leadership and specialist roles.	• Designated Safeguarding Leads. • Managers. • Trustees. • Specialist duties.	

7.8 Supervision, Support and Professional Boundaries

Safeguarding is strengthened through effective supervision, support and clear professional standards

Managers and Pathways Coordinators / Setting Delivery Leads will ensure appropriate opportunities are available for staff and volunteer mentors to:

- Discuss safeguarding concerns.
- Seek advice.
- Reflect on practice.
- Identify learning needs.
- Raise concerns about organisational practice.
- Access additional support following difficult safeguarding incidents.

Where involvement in a safeguarding matter has been particularly distressing, appropriate wellbeing support will be made available.

Category	Principle / Requirement	Action / Standard	Notes
Professional Standards of Conduct	Promote trust, confidence, and safety in all interactions representing MCR Pathways.	• Act with honesty and integrity. • Treat everyone with dignity and respect. • Maintain professional boundaries and promote inclusion. • Follow policies and report safeguarding concerns.	Applies at all times, including outside normal working hours if behaviour affects the organisation.
Professional Boundaries	Protect both young people and adults by maintaining clear professional limits.	• No inappropriate personal relationships. • No unauthorised sharing of contact details or social media use. • Meet only within approved arrangements.	Discuss uncertainties with a manager or Designated Safeguarding Lead.
Digital Communication	Ensure electronic communication is appropriate, professional, and capable of appropriate organisational oversight	• Use approved organisational systems. • Respect confidentiality and data protection.	Personal messaging apps should not be used with young people unless explicitly authorised.

7.9 Whistleblowing and Allegation Management

MCR Pathways maintains a culture where concerns about unsafe practice can be raised without fear of victimisation. Concerns about organisational practice should be raised in accordance with MCR Pathways' Whistleblowing Policy.

Allegations or safeguarding concerns involving MCR Pathways staff, volunteer mentors, trustees, contractors or others acting on behalf of MCR Pathways will be managed promptly, fairly and with appropriate confidentiality, in accordance with applicable statutory guidance and organisational procedures.

Where an allegation concerns a person working or volunteering with children, MCR Pathways will follow the relevant allegations management arrangements. In England, this will include referral to or consultation with the Local Authority Designated Officer, where required. In Scotland, the relevant local child protection, social work and police procedures will be followed where required.

Where the individual is working within a partner setting, MCR Pathways will also work with the setting's safeguarding lead in accordance with the safeguarding arrangements agreed with that setting.

No individual should investigate an allegation independently.

7.10 Continuous Improvement

MCR Pathways is committed to continually reviewing and improving its recruitment and professional standards.

MCR Pathways will:

- Review recruitment practices regularly
- Update policies in response to legislative changes
- Learn from safeguarding concerns, incidents and audits
- Promote a culture of openness, accountability and continuous learning
- Ensure professional standards remain aligned with safeguarding requirements and recognised good practice

Key Principle

Safer recruitment is not a single event but an ongoing commitment.

Protecting children, young people and adults depends upon recruiting suitable individuals, maintaining high professional standards, providing effective supervision and creating a culture in which safeguarding is embedded throughout the organisation.

8. Adult Safeguarding

MCR Pathways' direct programme work is with children and young people. Adult safeguarding concerns may nevertheless arise in connection with our work, and MCR Pathways is committed to responding appropriately where an adult may be at risk of abuse, neglect or exploitation.

The types of harm and abuse are defined by

<https://www.anncrafttrust.org/resources/types-of-harm>

Type of Harm	Description
Self-neglect	Neglecting to care for one's personal hygiene, health, or surroundings, such as hoarding.
Modern Slavery	Encompasses slavery, human trafficking, forced labour, and domestic servitude.
Domestic Abuse	Psychological, physical, sexual, financial, and emotional abuse within a family, including "honour" based violence.
Discriminatory	Abuse centering on perceived differences regarding protected characteristics like race, gender, or disability.
Organisational	Neglect and poor care practice within institutions or care settings resulting from structure, policies, or processes.
Physical	Includes hitting, slapping, pushing, kicking, restraint, and misuse of medication.
Sexual	Includes rape, indecent exposure, harassment, and any sexual acts to which the adult has not consented.
Financial or Material	Theft, fraud, internet scamming, and coercion regarding an adult's financial affairs, property, or benefits.
Neglect and Acts of Omission	Ignoring medical or physical care needs and withdrawing necessities like medication, nutrition, and heating.
Emotional or Psychological	Threats of harm, humiliation, controlling behaviour, intimidation, coercion, verbal abuse, and isolation.
Cyber Bullying	Repeatedly picking on or harming another person online or through technology to damage or humiliate them.
Forced Marriage	A marriage where one or both parties are married without consent or against their will.
Mate Crime	When vulnerable people are befriended by individuals who then exploit and take advantage of them.
Radicalisation	Inspiring recruits or persuading vulnerable individuals to adopt extreme views or the legitimacy of a cause.
Non-recent child abuse	Historical abuse where an adult was abused as a child or young person under the age of 18.

8.1 Responding to Adult Safeguarding Concerns

Where concerns arise regarding an adult who may be at risk, staff and volunteers must:

- Listen carefully.
- Treat the concern seriously.
- Record factual information.
- Report the concern without delay through the agreed safeguarding route.
- Seek emergency assistance where immediate danger exists.
- Cooperate with statutory safeguarding agencies.

Staff should never investigate concerns independently or make promises regarding confidentiality.

9. Prevent Radicalisation and Extremism

MCR Pathways is committed to protecting children, young people and adults from the risks associated with radicalisation and violent extremism.

Where MCR Pathways works within a school, further education college or other delivery setting subject to the Prevent Duty, staff and volunteer mentors must follow the safeguarding arrangements agreed with that setting.

Concerns relating to radicalisation or extremism will be treated as safeguarding concerns and responded to through the agreed safeguarding reporting route.

9.1 Definitions and Indicators of extremism or radicalisation

Category	Details
Definition	Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to: • negate or destroy the fundamental rights and freedoms of others; or • undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights or • intentionally create a permissive environment for others to achieve the results in (1) or (2). The government provides guidance for behaviour that could constitute extremism and the Department of Education guidance on managing risk of radicalisation should be referred to for further indicators. Any concerns around radicalisation or extremism should be reported using the standard reporting procedure. The DSL will take appropriate action which may include a Prevent Referral, in most cases with the consent of parents and carers.
Process of Radicalisation	The process of radicalisation may involve: • being groomed online or in person • exploitation, including sexual exploitation

Category	Details
	• psychological manipulation • exposure to violent material and other inappropriate information • the risk of physical harm or death through extremist acts.
Vulnerability Factors	Anyone can be radicalised but there are some factors which may make a young person more vulnerable including: • being easily influenced or impressionable • having low self-esteem or being isolated • feeling that rejection, discrimination or injustice is taking place in society • experiencing community tension amongst different groups • being disrespectful or angry towards family and peers • having a strong need for acceptance or belonging • experiencing grief such as loss of a loved one.
Behavioural Indicators	If a child or young person is being radicalised their day-to-day behaviour may become increasingly centred around an extremist ideology, group or cause. For example, they may: • spend increasing amounts of time talking to people with extreme views (this includes online and offline communication) • change their style of dress or personal appearance • lose interest in friends and activities that are not associated with the extremist ideology, group or cause • have material or symbols associated with an extreme cause • try to recruit others to join the cause

Responding to Prevent Concerns

Where concerns arise:

- Remain calm.
- Record factual information and observations.
- Report the concern without delay through the agreed safeguarding route
- Do not challenge or debate extremist views.
- Do not investigate independently.
- Cooperate with statutory agencies where referrals are required.

The relevant safeguarding lead, whether within MCR Pathways or the delivery setting, will determine whether further advice or referral is necessary.

10. Safe Digital Practice

10.1 Requirements for Safe Digital Practice

Staff and volunteers mentors must:

- Use approved communication methods.

- Maintain professional boundaries.
- Protect confidential information.
- Report online safeguarding concerns without delay through the agreed safeguarding route.
- Follow organisational digital communication guidance.
- Never share inappropriate material
- Do not use personal accounts or messaging apps to communicate with young people unless explicitly authorised.

Electronic communication should always be capable of appropriate organisational oversight.

Online Safeguarding Applications		Potential Online Risks	
Virtual mentoring	Social media	Cyberbullying	Fraud
Email communication	Digital collaboration	Online grooming	Coercion
Video meetings	Mobile technology	Sexual exploitation	Sextortion
Online learning		Exposure to harmful content	Image-based abuse
		Radicalisation	Privacy breaches
		Identity theft	Inappropriate online relationships

11. Emerging Risks

11.1 Emerging Safeguarding Risks

Safeguarding risks continue to evolve.

MCR Pathways will monitor developments including:

- Artificial intelligence and emerging technologies
- Online manipulation
- New forms of exploitation
- Digital fraud
- Social media trends
- Harmful online communities
- New patterns of organised criminal exploitation

MCR Pathways will review and update policies and training as relevant new safeguarding risks emerge.

Key Principle

Safeguarding extends beyond responding to abuse. It includes recognising new and emerging risks, promoting safe environments, ensuring safe digital practice and preventing harm before it occurs.

Every individual working, volunteering or otherwise acting on behalf of MCR Pathways has a responsibility to remain informed, vigilant and prepared to act whenever safeguarding concerns arise.

12. Training, Governance and Quality Assurance

12.1 Purpose

Safeguarding is strengthened through effective governance, continuous learning and regular review.

MCR Pathways is committed to maintaining high safeguarding standards by ensuring staff and volunteers receive appropriate training, safeguarding arrangements are regularly monitored, and policies are reviewed to reflect changes in legislation, guidance and organisational learning.

12.2 Safeguarding Training

Every individual working, volunteering or otherwise acting on behalf of MCR Pathways must receive safeguarding training appropriate to their role. Training will cover, where applicable:

- Safeguarding and child protection
- Recognising abuse, neglect and other safeguarding concerns

- Recognising and responding to discrimination, prejudice and hate related behaviour as safeguarding concerns.
- Reporting safeguarding concerns, including agreed setting reporting routes and MCR Pathways escalation arrangements.
- Professional boundaries.
- Code of Conduct.
- Information sharing and confidentiality.
- Equality, diversity and inclusion.
- Online safety and digital safeguarding.
- Prevent awareness.

Training should be completed before, or as soon as reasonably practicable after, commencing duties and refreshed at regular intervals.

Training records will be maintained centrally and monitored to ensure compliance.

12.3 Supervision and Support

Safeguarding practice is strengthened through regular supervision and reflective discussion.

Managers will support staff, and Pathways Coordinators / Setting Delivery Leads will support volunteer mentors, by:

- Providing opportunities to discuss safeguarding concerns
- Monitoring safeguarding practice
- Identifying learning and development needs
- Providing support following challenging safeguarding incidents
- Encouraging professional reflection and continuous improvement

Appropriate wellbeing support will be available to staff and volunteers affected by safeguarding matters.

12.4 Safeguarding Governance

Area	Included Reports
Safeguarding Governance	• Safeguarding activity • Training compliance • Significant safeguarding incidents • Audit findings • Policy reviews • Emerging safeguarding risks • Actions taken to improve safeguarding practice

The Chair of the Board of Trustees, in their role as Safeguarding Trustee, will provide independent oversight and assurance to the Board.

12.5 Quality Assurance

Area	Activities
Quality Assurance	• Safeguarding audits • MCR Pathways' safeguarding record reviews • Training compliance monitoring • Policy compliance checks • Staff and volunteer feedback • Lessons learned reviews • Risk assessments • Governance reporting

Findings will be used to strengthen safeguarding practice and inform future improvements.

12.6 Managing Risk

Safeguarding risks will be identified, assessed and monitored through the organisation's risk management framework.

Risk assessments should be undertaken for:

- New programmes
- Events
- Off-site activities
- Digital, virtual or hybrid delivery
- New delivery settings and Partnership agreements
- Lone working
- High-risk activities

Where risks are identified, appropriate control measures must be implemented and reviewed

Section	Details/Requirements
Record Management	Safeguarding records must be: • Accurate. • Timely. • Objective. • Secure. • Confidential. • Retained in accordance with organisational retention schedules and legal requirements. Access to safeguarding information will be limited to those with a legitimate need to know.
Policy Review	This manual will be formally reviewed: • At least annually. • Following significant legislative changes. • After serious safeguarding incidents. • Following organisational learning.

Section	Details/Requirements
	• When changes to programme delivery require policy updates. • Minor operational updates may be made throughout the year where necessary.

Where safeguarding risks are identified, MCR Pathways will ensure that appropriate control measures are implemented and reviewed.

Appendices

Appendix 1 - CONTACT DETAILS FOR SAFEGUARDING IN PARTICIPATING LOCAL AUTHORITIES

6.1 LOCAL AUTHORITIES IN ENGLAND	Ealing - London Hertfordshire Surrey Middlesbrough Newcastle Sunderland
6.2 LOCAL AUTHORITIES IN SCOTLAND	Aberdeen Aberdeenshire Argyll and Bute Clackmannanshire Dundee Dumfries and Galloway East Dunbartonshire Edinburgh Eilean Siar Fife Falkirk Glasgow Highland Inverclyde North Ayrshire Perth & Kinross Stirling South Lanarkshire Scottish Borders West Lothian

Appendix 2 - Codes of Conduct

STAFF CODE OF CONDUCT [Code of Conduct](#)

MENTOR CODE OF CONDUCT [Mentor Code of Conduct](#)

Appendix 3 - Key Supporting Documents

 KEY SUPPORTING DOCUMENTS