Meadow Pathways Wellbeing and Education Cornwall (MPWEC)

Safeguarding and Child Protection Policy

Education other than at School (EOTAS)

Responsibility to update: Zoe Waitz and Michelle Pascoe
Applies to: All staff, contractors, volunteers and visiting professionals working with children and young people (CYP) engaged in Meadow Pathways EOTAS packages (including tuition in homes, community venues and online).

Version No: 3
Date: September 2026
Review Date: September 2027

Summary of Changes – September 2026 Review

This policy has been reviewed and updated in September 2026 to reflect Keeping Children Safe in Education (KCSIE) 2026 (statutory guidance, in force from 1 September 2026), Working Together to Safeguard Children 2026 (in force from 18 March 2026), and other relevant UK government guidance. Key changes made at this review:

- All references updated from KCSIE 2025 and Working Together to Safeguard Children 2023 to the September 2026 and March 2026 editions.
- Added the new "Family Help" model (replacing separate early help and Section 17 pathways) and the duty to share safeguarding-relevant information between agencies, reflecting Working Together 2026 and the Children's Wellbeing and Schools Act 2026.
- Added self-harm, suicidal ideation and suicide risk as standalone safeguarding concerns in their own right.
- Added children who are repeatedly removed from a classroom/session, on a part-time timetable, pregnant, or acting as a young carer to the groups requiring particular vigilance – directly relevant to children accessing EOTAS provision.
- Strengthened wording on recognising and challenging racism, faith-based prejudice and other discriminatory behaviour as safeguarding matters.
- Added recognition of child-to-parent/carer abuse, and clarified that child sexual and criminal exploitation can involve organised networks and may constitute modern slavery.
- Updated terminology from "sexting"/"indecent images" to "nudes and semi-nudes", including AI-generated or "deepfake" images, under Online Safety.
- Added a short section on gender-questioning children reflecting new DfE guidance on parental involvement and safeguarding-led decision-making.
- Added reference to the DfE's voluntary national standards for non-school alternative provision, which Meadow Pathways has had regard to given it takes referrals from local authorities, schools and parents directly.
- Strengthened wording on Designated Safeguarding Lead (DSL) cover arrangements to ensure they are robust, clear and known to all staff at all times.
- **Version 3 (September 2026):** added sections on types and signs of abuse; what to do if a child tells you something; allegations against staff (including where the concern is about a Director or the DSL); Prevent; mental health, self-harm and suicide; personal care; online sessions; and a single, clear reporting route. MASSH contact details and the out-of-hours number updated (replacing references to MARU).

This summary is provided for ease of reference; the changes are reflected throughout the policy below.

Introduction

Meadow Pathways Wellbeing and Education Cornwall is an alternative EOTAS (Education Otherwise Than At School) provider committed to safeguarding and promoting the welfare of all children and young people in our care. This policy sets out our approach and responsibilities, aligned with Keeping Children Safe in Education (KCSIE) 2026, Working Together to Safeguard Children 2026, and Cornwall local safeguarding arrangements.

Safeguarding is everyone's responsibility. Every member of staff, contractor and volunteer must read this policy, and at least Part One of KCSIE 2026, and confirm they have understood it.

Legal Framework

- Children Act 1989 & 2004
- Education Act 2002
- Keeping Children Safe in Education (2026)
- Working Together to Safeguard Children (2026)
- Children's Wellbeing and Schools Act 2026
- Counter-Terrorism and Security Act 2015 (Prevent duty)
- Equality Act 2010
- Human Rights Act 1998
- UK GDPR and the Data Protection Act 2018
- DfE Voluntary National Standards for Non-School Alternative Provision (2025)

Definitions

Safeguarding: Protecting children from maltreatment, preventing impairment of health or development, ensuring children grow up in circumstances consistent with safe and effective care, and taking action to enable all children to have the best outcomes.

Child Protection: Part of safeguarding focused on protecting children identified as suffering, or likely to suffer, significant harm.

Child: Anyone under the age of 18.

Roles and Responsibilities

- **Head of Provision:** Michelle Pascoe and Zoe Waitz (Founding Directors).
- **Designated Safeguarding Lead (DSL):** Michelle Pascoe – 07563 862530 – Michelle.Pascoe@meadowpathwayscornwall.com
- **Deputy DSL:** Zoe Waitz – 07563 855070 – Zoe.Waitz@meadowpathwayscornwall.com
- All team members must understand and fulfil their safeguarding duties.

Professional Responsibilities

- Ensure children feel safe and listened to.
- Create an environment where children feel valued.
- Consider and act upon the best interests of the child.
- Follow safer recruitment rigorously.
- Maintain ongoing learning, development, and supervision.
- Recognise additional challenges for children with SEND or health conditions, including communication barriers and the risk that signs of abuse are mistaken for a child's disability or needs.
- Be vigilant to signs of abuse, including for those with complex needs.
- Understand child-on-child abuse.
- Maintain an 'it could happen here' attitude.
- Follow procedures for sharing concerns, including low-level concerns.
- Implement Cornwall local safeguarding procedures.
- Provide opportunities for children to learn about safe relationships.

- Give particular attention to children who are repeatedly removed from a classroom or session, placed on a part-time timetable, pregnant, acting as a young carer, or showing early signs of harmful behaviour – recognising these as groups who may need additional support and closer monitoring.
- Adopt a zero-tolerance approach to harassment, violence, and bullying.

Designated Safeguarding Lead and Deputy

Appointment: Directors Michelle Pascoe and Zoe Waitz are the DSL and Deputy DSL. Both complete DSL training every two years, with safeguarding updates at least annually.

Availability and cover: The DSL or Deputy DSL is contactable by phone throughout every session. Staff are told at induction, and reminded regularly, how to reach them. If neither can be reached and a child may be at risk, staff must contact the Multi-Agency Support and Safeguarding Hub (MASSH) directly and inform the DSL as soon as possible afterwards.

DSL Responsibilities:

- Support team members with concerns.
- Advise actions on safeguarding concerns.
- Ensure children are safeguarded immediately.
- Maintain robust DSL/Deputy DSL cover arrangements that are clear, reliable and known to all staff, so a child's concern is never delayed by an absence.
- Liaise with local agencies, including MASSH, the LADO and the Cornwall and Isles of Scilly Safeguarding Children Partnership (CIOS SCP).
- Inform the commissioning school's DSL or the placing local authority of any safeguarding concern about a child they have placed with us, on the same day.
- Adopt a child-focused, holistic approach.
- Refer to Channel, police and the DBS as required.
- Manage allegations against staff in line with this policy and KCSIE 2026 Part 4.
- Monitor and report on safeguarding.
- Promote the achievements of looked-after and previously looked-after children, and maintain contact with their social workers and Virtual School.
- Oversee online safety, including arrangements for online sessions (see the Online Safety Policy).

Record Keeping: Maintain detailed, secure, dated records of all concerns, decisions and actions in child protection files, kept separately from other records.

Information Sharing: Data protection law is not a barrier to sharing information to keep a child safe. Information is shared as required for a child's welfare, in line with Working Together 2026 and our Data Protection Policy.

File Transfer: When a child moves to a new setting, the DSL makes sure their child protection file is transferred securely and separately from other records, within 5 days for an in-year move or within the first 5 days of the start of a new term.

Training and Updates

- Regular updates via training, meetings, or written bulletins.
- Mandatory: Introduction to Safeguarding (week 1), Safeguarding Foundation (3 months), annual KCSIE update, and Prevent awareness training.

- All staff read KCSIE 2026 Part One and complete the KCSIE quiz.
- Annual line-manager competency check with refresher if needed.
- DSL/Deputy advanced training every two years.
- Leadership familiar with Working Together guidance.

Safer Recruitment

Enhanced DBS checks with children's barred list checks, identity and reference verification, and pre-employment safeguarding training, in line with our Safer Recruitment Policy. We maintain a Single Central Record.

Types and Signs of Abuse

All staff must be able to recognise the main types of abuse and neglect. Abuse can happen in person or online, and a child may experience more than one type at the same time.

- **Physical abuse:** hitting, shaking, throwing, poisoning, burning, drowning, suffocating or otherwise causing physical harm. Signs may include unexplained injuries, bruising in unusual places, or explanations that do not fit the injury.
- **Emotional abuse:** persistent emotional ill-treatment, such as making a child feel worthless, unloved or frightened, or exposing them to domestic abuse. Signs may include low self-esteem, withdrawal, anxiety or extreme behaviour.
- **Sexual abuse:** forcing or enticing a child to take part in sexual activities, including online. Signs may include age-inappropriate sexual knowledge or behaviour, or changes in mood or behaviour.
- **Neglect:** persistent failure to meet a child's basic physical or psychological needs. Signs may include poor hygiene, hunger, inappropriate clothing, or missed health appointments.
- **Domestic abuse:** children who see, hear or experience domestic abuse are victims in their own right.
- **Child-to-parent/carer abuse:** abuse by a child towards a parent or carer is recognised as a safeguarding concern for the whole family.
- **Child sexual exploitation (CSE) and child criminal exploitation (CCE), including county lines:** children may be groomed, coerced or controlled into sexual or criminal activity. Exploitation can involve organised networks and may constitute modern slavery. Signs may include unexplained money or gifts, going missing, older "friends", or carrying drugs or weapons.
- **Female genital mutilation (FGM), forced marriage and so-called "honour"-based abuse:** any concern is reported to the DSL immediately.
- **Radicalisation:** see the Prevent section below.

Staff must never assume that a sign of possible abuse is simply part of a child's SEND, trauma history or behaviour. If in doubt, speak to the DSL.

Mental Health, Self-Harm and Suicide

Mental health concerns, self-harm, suicidal thoughts and suicide risk are safeguarding concerns in their own right. Many of the young people we support have experienced trauma or have social, emotional and mental health needs.

- Any sign, disclosure or concern about self-harm or suicidal thoughts must be reported to the DSL straight away.
- If a young person is at immediate risk, stay with them, call 999, and then inform the DSL and the young person's parent or carer.
- Where the risk is not immediate, the DSL agrees next steps with the family and the commissioning school or local authority, and signposts to support such as NHS 111 (option 2) or the NHS 24/7 mental health helpline (0800 038 5300).
- Staff do not promise to keep self-harm or suicidal thoughts secret.

Racism and Discrimination

Racism, faith-based prejudice (including Islamophobia and antisemitism), homophobia, transphobia, ableism, misogyny and other discriminatory behaviour are recognised and challenged as safeguarding matters, not only as equality matters. Incidents are recorded, reported to the DSL and responded to in line with our Anti-Bullying and Equality, Diversity & Inclusion policies.

Early Help and Family Help

Identify and refer children needing Early Help under the Children Act 1989. Team members are aware of local Early Help processes and vulnerabilities.

Following Working Together to Safeguard Children 2026, early help and Section 17 (Children Act 1989) support are now delivered through a single "Family Help" pathway with one named lead practitioner per family; team members should refer to this as "Family Help" and support joined-up, whole-family working with the lead practitioner.

What to Do if a Child Tells You Something

- Stay calm, listen carefully and let the child speak freely.
- Reassure them they have done the right thing by telling you.
- Never promise to keep a secret – explain that you will need to tell someone who can help.
- Do not ask leading questions or investigate; only ask what is needed to understand whether the child is safe right now.
- Record what was said as soon as possible, in the child's own words, with the date, time, place and your name and signature.
- Report to the DSL immediately using the Safeguarding Concern Form. If a child is in immediate danger, call 999 first.

Reporting Concerns

All staff, contractors and volunteers follow one reporting route:

- **Immediate danger:** call 999, then inform the DSL.
- **Any other safeguarding concern:** report to Meadow Pathways' DSL (Michelle Pascoe) or Deputy DSL (Zoe Waitz) straight away, and complete the Safeguarding Concern Form the same day.
- The DSL decides on next steps, including a referral to MASSH, and informs the commissioning school's DSL or placing local authority on the same day.

- If the DSL and Deputy DSL cannot be reached, or you believe a child is not being protected, you must contact MASSH directly (0300 123 1116; out of hours 01208 251300). Anyone can make a referral.
- If you feel a concern has not been acted on, escalate it – first to the other Director, then to MASSH or the LADO.

Clear, factual records are kept of every concern, the decisions made and the reasons for them.

Allegations Against Staff, Volunteers and Contractors

We follow KCSIE 2026 Part 4. An allegation must be reported if anyone working with Meadow Pathways has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (including behaviour outside work).

What happens:

- Report the allegation to the DSL immediately. Do not investigate, and do not tell the person the allegation is about.
- The DSL contacts the Local Authority Designated Officer (LADO) within one working day, before taking any other action, and informs the commissioning school or local authority.
- The LADO advises on next steps, which may include a police or children's social care investigation, and whether the person should be suspended while this happens.
- **If the allegation is about Michelle Pascoe (DSL),** report it to Zoe Waitz and the LADO. **If it is about Zoe Waitz,** report it to Michelle Pascoe and the LADO. If the allegation is about both Directors, or you do not feel able to raise it internally, contact the LADO directly on 01872 326536 or lado@cornwall.gov.uk.

Low-level concerns – behaviour that does not meet the threshold above but feels "not quite right", such as a lapse in professional boundaries – are reported to the DSL using the Low Level Concern Form. They are recorded and reviewed for patterns. Raising a low-level concern is not, in itself, a disciplinary matter.

DBS and Professional Referrals

The Directors refer to the DBS, and to other relevant bodies such as the Teaching Regulation Agency, when a person is dismissed, or would have been dismissed had they not left, because they harmed or posed a risk of harm to a child.

Whistleblowing

Staff can raise concerns about poor or unsafe practice, or about the way Meadow Pathways is managing safeguarding, under our Whistleblowing Policy without fear of detriment. Staff can also contact the NSPCC Whistleblowing Advice Line on 0800 028 0285 (help@nspcc.org.uk).

Partnership and Information Sharing

- **Emergency:** 999
- **Multi-Agency Support and Safeguarding Hub (MASSH):** 0300 123 1116, massh@cornwall.gov.uk. Out of hours (evenings, weekends and bank holidays): 01208 251300
- **LADO:** 01872 326536, lado@cornwall.gov.uk
- **CIOS SCP:** 01872 324218, ciosscp@cornwall.gov.uk
- **NSPCC Whistleblowing Advice Line:** 0800 028 0285

Share information in line with data protection law and local protocols.

Child-on-Child Abuse

Zero tolerance; follow Cornwall procedures; support victims; implement contextual safeguarding; refer as required to police or social care. Child-on-child abuse includes bullying (including online), physical abuse, sexual violence and sexual harassment, harmful sexual behaviour, initiation or hazing-type violence, and the sharing of nudes and semi-nudes. It is never dismissed as "banter" or "part of growing up".

Gender-Questioning Children

Where a child or their parent/carer raises a question about gender identity or requests support with social transition, Meadow Pathways follows current DfE guidance: parents/carers are involved wherever it is safe to do so, and their views are given great weight, because they know their children best. The DSL is consulted where there is reason to think involving a parent/carer would put the child at greater risk. Meadow Pathways does not itself initiate any such action, and any decisions are made on a case-by-case, safeguarding-led basis in partnership with the commissioning school/LA and family.

Bullying

Define and tackle bullying as a safeguarding matter; report to DSL immediately; support all pupils. See our Anti-Bullying Policy.

Prevent

Meadow Pathways has due regard to the need to prevent people from being drawn into terrorism. All staff complete Prevent awareness training. Any concern that a young person may be at risk of radicalisation is reported to the DSL, who will seek advice and, where appropriate, make a Prevent referral to the police for consideration under Channel. If there is an immediate risk, call 999.

Preventative Strategies

Embed PSHE/RSE; tailor for SEND; promote online safety; include LGBTQ+ inclusion.

Online Safety

Our Online Safety Policy sets out our full approach, including arrangements for online sessions. In summary:

- We teach and model safe use of technology, covering the four areas of risk in KCSIE 2026: content, contact, conduct and commerce.

- Meadow Pathways does not provide internet access for young people at community venues. Where a young person uses a Meadow Pathways device, appropriate filtering is in place. Staff supervise any device use during sessions.
- Online sessions take place only on Meadow Pathways' approved platform, using organisation accounts, in line with the Online Safety Policy.
- The making or sharing of nude or semi-nude images by a young person under 18 ("nudes and semi-nudes", replacing the terms "sexting" and "indecent images") is treated as a safeguarding matter, whatever the technology used – including AI-generated, digitally altered or "deepfake" images. Staff must not view, copy, print, share or store the image, and must report to the DSL immediately.
- Staff are alert to artificial intelligence as an emerging safeguarding risk, including its role in online content, contact and conduct risks to children.

Personal Care

Meadow Pathways does not provide intimate care. We will, however, never leave a child or young person in a state of need, distress or discomfort.

Where a young person needs help with personal care – for example after a toileting accident, being sick, or getting wet or muddy outdoors – staff support the young person to help themselves. This means giving calm, respectful prompts, privacy, and the items they need (such as spare clothes, wipes or a towel), while protecting the young person's dignity.

- Staff do not carry out intimate care tasks for a young person.
- The young person's parent or carer is contacted as soon as possible and may be asked to attend.
- Every instance is recorded and reported to Meadow Pathways' DSL on the same day.
- Any concern that arises, such as a mark, injury or disclosure, is reported to the DSL immediately under this policy.
- Where a young person is known to have personal or intimate care needs, these are discussed with parents/carers and the commissioning school or local authority before a placement begins, and a plan is agreed.

Children Absent from Education

Monitor attendance; the DSL follows up unexplained or unauthorised absences on the same day with the parent/carer and the commissioning school or local authority; multi-agency referrals for missing pupils; record and escalate serious cases. Repeated or unexplained absence can be a sign of abuse, neglect or exploitation.

Monitoring and Review

This policy is reviewed at least annually by the Directors, or sooner if guidance changes or following a serious incident. All staff are told about changes and confirm they have read the updated policy.