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OPERATING POLICIES

Gateway Psychology Operating Policies are statements on the way Gateway Psychology will operate within the Business System. They signal the values and philosophy of our Company and provide a framework of general principles for all employees, Associates and colleagues to follow.

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SIGNATORIES (signed and controlled electronically)

Dr Meryl Ann Forse

Dr M.A. Forse – Managing and Clinical Director

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1.0 SCOPE OF POLICY

This policy applies to all employees, Directors, Contracted Associates, agency and sessional workers, volunteers, trainees, students, service contractors and any other person working on behalf of Gateway Psychology Ltd (“the Company”). For the purposes of this policy, these individuals are collectively referred to as “staff”, unless otherwise specified.

2.0 WHY WE NEED A POLICY

Gateway Psychology believes that every child and young person has the right to be safe and protected from harm. We recognise our responsibility to safeguard and promote the welfare of children and young people with whom we come into contact and are committed to child-centred, trauma-informed and anti-discriminatory safeguarding practice.

We recognise that:

- the welfare and best interests of the child or young person are paramount;
- safeguarding is everyone’s responsibility;
- all children have the right to protection from harm, abuse, neglect and exploitation, regardless of age, disability, sex, gender identity, race, ethnicity, religion or belief, sexual orientation, socio-economic circumstances or other characteristics;
- children may experience multiple and intersecting forms of harm;
- some children may be additionally vulnerable as a result of previous experiences, trauma, disability, developmental or communication needs, care experience, family circumstances, discrimination or other factors;
- children’s wishes, feelings and lived experiences should be heard and taken seriously, with communication adapted to their age, developmental level and individual needs; and
- effective safeguarding requires appropriate partnership working and information sharing between children, young people, parents/carers and relevant agencies.

The purpose of this policy:

- To provide protection for the children and young people who receive a service from the Company, including the children of adult members or users.
- To provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect a child or young person may be experiencing, or be at risk of, harm.
- To provide staff and volunteers with guidance on procedures they should adopt in the event that they are subject to an allegation of harming a child or young person

DEFINITIONS

Child: For the purposes of this policy, a child is anyone who has not yet reached their 18th birthday, in accordance with the Children Act 1989.

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Abuse and neglect: Children may be harmed through physical abuse, emotional abuse, sexual abuse and/or neglect. Safeguarding concerns may also arise in relation to domestic abuse, child sexual or criminal exploitation, trafficking and modern slavery, female genital mutilation, honour-based abuse, radicalisation, child-on-child abuse, online harm and other forms of extra-familial harm or exploitation. Further information regarding categories and indicators of abuse is contained within the Safeguarding Children Procedure (GP-PRO-003).

Safeguarding and promoting the welfare of children is understood in accordance with Working Together to Safeguard Children 2026. Gateway Psychology will have regard to current statutory guidance and relevant local multi-agency safeguarding arrangements in the exercise of its safeguarding responsibilities. Current statutory guidance is now the March 2026 edition. Safeguarding may be understood as:

- protecting children maltreatment
- preventing impairment of children’s health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcome.

3.0 KEY MANAGEMENT RESPONSIBILITIES

- 3.1 This policy applies to all staff, including senior managers and board of directors, paid staff, associates, volunteers and sessional workers, agency staff, trainees, students or anyone working on behalf of the Company or using its premises.
- 3.2 Understand current and new policies, and the role of management with respect to them.
- 3.3 Managers are responsible for promoting a culture in which safeguarding is understood as everyone's responsibility
- 3.4 Ensuring staff understand and comply with this policy and associated procedures
- 3.5 Ensuring concerns are taken seriously and acted upon appropriately;
- 3.6 Supporting staff to access safeguarding advice, supervision and training
- 3.7 Monitoring the effectiveness of safeguarding arrangements within their areas of responsibility.
- 3.8 Gateway Psychology will appoint a Designated Safeguarding Lead (DSL) and one or more Deputy Designated Safeguarding Leads as appropriate. The DSL has overall responsibility for safeguarding practice within the Company, including providing advice and support to staff; overseeing safeguarding concerns, referrals and records; supporting appropriate information sharing and multi-agency working; monitoring safeguarding training and practice; and ensuring safeguarding arrangements remain

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consistent with current national and local guidance. In the absence of the DSL, safeguarding matters may be managed by an appropriately designated Deputy DSL.

- 3.9 The Company will appoint a Caldicott Guardian to provide oversight and advice regarding the appropriate use and sharing of confidential information. The roles of DSL and Caldicott Guardian may be held by the same appropriately qualified person; however, the responsibilities of each role remain distinct

4.0 DETAILS OF THE POLICY

- 4.1 The Company believes that children must be protected from harm at all times.
- 4.2 We believe every child should be valued, respected, safe and heard. We will seek to create an environment in which children and young people feel able to communicate worries, concerns or experiences of harm and in which their wishes, feelings and lived experiences inform safeguarding decision-making wherever appropriate.
- 4.3 We recognise the importance of identifying emerging needs and providing or facilitating help and support at the earliest appropriate opportunity. Safeguarding is not limited to responding where significant harm has already occurred.
- 4.4 We want children who use or have contact with this Company to enjoy what we have to offer in safety.
- 4.5 Gateway Psychology recognises that many children and young people accessing our services may have experienced trauma, abuse, neglect, disrupted relationships, discrimination or other adversity. Our safeguarding practice will be child-centred and trauma-informed. We will seek to understand the child's behaviour and communication within the context of their experiences and will take account of their age, developmental level, disability, neurodevelopmental presentation, communication needs, culture and individual circumstances.
- 4.6 We will seek to safeguard children and young people by:
- valuing, listening to and respecting them
 - maintaining effective safeguarding policies and procedures
 - ensuring staff understand their individual safeguarding responsibilities
 - recruiting staff safely and undertaking appropriate pre-employment checks
 - providing appropriate safeguarding training, supervision and support
 - responding promptly to concerns and disclosures; maintaining clear and secure safeguarding records
 - sharing relevant information appropriately with agencies and professionals;
 - involving children and parents/carers appropriately in safeguarding decisions
 - and working collaboratively with other professionals and agencies.
- 4.7 Safeguarding concerns, disclosures, decisions, actions and relevant safeguarding information will be recorded promptly and accurately on MyConcern, Gateway Psychology's designated safeguarding recording system. Records should distinguish between fact, professional observation and opinion and should include the actions taken, decisions made and the rationale for those decisions. Access to MyConcern is

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restricted to authorised staff according to role and safeguarding need. Safeguarding records will be handled in accordance with Gateway Psychology's information governance, confidentiality and data protection requirements.

- 4.8 Recording a concern on MyConcern does not, in itself, discharge an individual's safeguarding responsibility. Where there is an immediate risk, significant concern or other need for prompt safeguarding action, staff must also contact the DSL/Deputy DSL or other appropriate safeguarding service in accordance with the Safeguarding Children Procedure (GP-PRO-003).
- 4.9 Gateway Psychology recognises that appropriate and timely information sharing is essential to safeguarding children. Relevant information may be shared with Children's Social Care, police, health services, education providers and other appropriate agencies where this is necessary and proportionate to safeguard or promote the welfare of a child. Consent will be sought where appropriate, but a lack of consent will not prevent information being shared where there is a lawful basis to do so and safeguarding considerations require it. Decisions to share or not share safeguarding information, together with the rationale, will be recorded on MyConcern where appropriate.
- 4.10 We want parents and carers who use or attend our Company to be supported to care for their children in a way that promotes their child's health and well-being and keeps them safe.
- 4.11 Gateway Psychology will maintain an effective Safeguarding Children Procedure (GP-PRO-003) and will have regard to current national and local safeguarding guidance, including Working Together to Safeguard Children 2026 and the procedures, threshold framework and guidance of the Stoke-on-Trent Safeguarding Children Partnership. Where work is undertaken with children living outside Stoke-on-Trent, Gateway Psychology will have regard to the safeguarding arrangements and procedures of the relevant local authority and safeguarding partnership.
- 4.12 Where a member of staff believes that a child may be experiencing, or be at risk of, abuse, neglect, exploitation or other significant harm, they must act promptly in accordance with the Safeguarding Children Procedure (GP-PRO-003). Concerns should normally be discussed promptly with the DSL or Deputy DSL and recorded on MyConcern. Where appropriate, a referral will be made to the relevant Children's Social Care service and/or other safeguarding agency. Where a child is believed to be in immediate danger, emergency services should be contacted without delay. Staff must not delay necessary safeguarding action solely because the DSL or Deputy DSL is unavailable.
- 4.13 Gateway Psychology will normally seek to work openly and collaboratively with parents and carers and, where appropriate, inform them when safeguarding concerns arise. Information may be shared or action taken without parental/carers knowledge or consent where doing so is necessary to safeguard a child, where seeking consent could increase risk, prejudice an investigation or otherwise not be in the child's best interests.
- 4.14 Any allegation or safeguarding concern relating to an employee, Associate, contractor, volunteer, trainee, student or other person working on behalf of Gateway Psychology must be reported immediately to the appropriate senior manager and DSL, unless the concern relates to that person, in which case it must be reported to another

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appropriate senior person. Where the concern meets, or may meet, the relevant threshold, Gateway Psychology will seek advice from and/or make a referral to the Local Authority Designated Officer (LADO) in accordance with local procedures. Gateway Psychology will follow LADO, Children's Social Care and/or police advice as appropriate before undertaking an internal investigation where this could prejudice an external safeguarding or criminal process.

- 4.15 Gateway Psychology recognises that making a referral does not end its responsibility to safeguard a child. Where staff remain concerned that a child's needs or risks have not been adequately recognised or addressed, the matter should be discussed with the DSL and, where appropriate, escalated through the relevant local professional challenge or escalation arrangements.
- 4.16 All staff will receive safeguarding training appropriate to their role and responsibilities, including as part of induction and through refresher training and updates thereafter. Staff with designated safeguarding responsibilities will undertake additional training appropriate to those responsibilities. Training requirements will be reviewed in response to changes in legislation, statutory guidance, local safeguarding arrangements and organisational learning.
- 4.17 This policy and the associated Safeguarding Children Procedure will be reviewed at least annually and sooner where required following changes to legislation, statutory or local guidance, organisational practice, safeguarding incidents or learning from safeguarding reviews.
- 4.18 Gateway Psychology will have regard to relevant safeguarding legislation and statutory guidance, including the Children Act 1989, Children Act 2004, Children and Social Work Act 2017, Data Protection Act 2018 and Working Together to Safeguard Children 2026, together with other legislation and guidance relevant to the circumstances of an individual child.

5.0 CROSS REFERENCES TO OTHER POLICIES AND PROCEDURES

Safeguarding Children Procedure	GP-PRO-003
Equality Policy	GP-POL-002
Health and Safety Policy	GP-POL-004
Employee Handbook and Contract	
Confidentiality and Data Protection	GP-POL-006
Complaints Policy	GP-POL-001
Employment of Staff Policy	GP-POL-005

CHANGE HISTORY

Details of Change	Date of Change	Issue Level
Draft issue	3/12/2013	0
Initial Issue	22/6/2014	1
Para 4.7 updated to include historical abuse	23/2/2015	2
Annual Review – no changes made	19/03/2016	3
Para 4.8 added and reviewed on basis of Staffordshire County Council safeguarding documents	29/1/2017	4
Annual review, no changes made	17/1/2018	5
Revised based on “Working Together..2018” document	24/10/2018	6
Annual review – updated to include ‘gender identity’	31/07/2019	7
Annual review – updated Stoke Safeguarding website address link	20/09/2021	8
Annual review – added in additional definitions	31/07/2022	9
Annual review – added in statement about some children being additionally vulnerable	31/05/2023	10
Annual Review – no changes	27/2/2024	10
Annual review - added clause re Caldicott guardian	17/4/2025	11
Annual review - policy comprehensively updated to reflect Working Together to Safeguard Children 2026 and current Stoke-on-Trent Safeguarding Children Partnership arrangements. Updated DSL/LADO responsibilities, safeguarding definitions, information sharing, recording and escalation requirements; incorporated MyConcern safeguarding recording system and strengthened child-centred, trauma-informed and anti-discriminatory practice.	13/05/2026	12