



Safeguarding Policy

Date: September 2025

Review Date: September 2027

This policy will be reviewed annually by Laura McGrath, DSL. At every review, it will be approved by Peninsula.

This policy and its practices endeavour to reflect and reference 3 key documents throughout:

Keeping Children Safe in Education 2025

Working Together to Safeguard Children 2023 (updated 2025)

Ofsted Independent School Standards 2014

Safeguarding Contacts:

Laura McGrath (DSL) – laura@navigators.org.uk - 07368210312

Cerys Bickerton (DDSL) – cerysb@navigators.org.uk - 07835147197

Chloe Hamer (DDSL)– chloeh@navigators.org.uk – 07562 945521

Danielle Hewlett (DDSL)– danielleh@navigators.org.uk - 07729 090382

Nina Lethbridge (DDSL) – ninal@navigators.org.uk – 07835 147184

Head of Alternative Provision:

Seb Saghabashi – seb@navigators.org.uk - 07729 081544

Head of Education

Cheryl Holt – cherylh@navigators.org.uk - 07729 081541

Navigators is a member of the Manchester Schools Hub Network. Staff can find additional resources at: www.manchester.gov.uk/schoolshub

Navigators

1. Aims
2. Statutory Guidance and Legislation
3. Definitions
4. Equality statement
5. Roles and responsibilities
6. Confidentiality
7. Recognising abuse and responding appropriately
8. Notifying parents
9. Whistle-blowing / allegations towards staff
10. Allegations of abuse made against other students
11. Attendance
12. Record-keeping
13. Multi-Agency Working
14. Training
15. Staff who have contact with students and families
16. Serious Case Review
17. The Curriculum
18. Digital safeguarding/E Safety/Online Safety
19. Filtering and Monitoring
20. Safer Recruitment
21. RSHE and Gender Questioning Children
22. Alternative Provision and Relationships with School

Appendix 1: Types of abuse

Appendix 2: Safer recruitment and DBS checks – policy and procedures

Appendix 3: Allegations of abuse made against staff

Appendix 4: Specific safeguarding issues

Appendix 5: SSCP priorities

Appendix 6: The Bury Continuum of Need

Appendix 7: MSP Priorities

Appendix 8: Bolton Safeguarding Children Board



1. Aims

Through this policy Navigators aim to create and maintain a safe environment and community where all young people and adults feel safe, secure and valued. We work hard to create strong relationships and show a commitment to safeguarding all young people.

This policy has been developed to ensure that all adults in our organisation are working together to safeguard and promote the welfare of children and have the knowledge to identify and address any safeguarding concerns and to ensure practice is consistently good.

Our approach is student centred.

‘Keeping children safe in education is statutory guidance that schools and colleges in England must have regard to when carrying out their duties to safeguard and promote the welfare of children. It is essential that everybody working in a school or college understands their safeguarding responsibilities. Governing bodies and proprietors should ensure that those staff who work directly with children read at least Part one of the guidance.’
(KCSIE, 2025)

Navigators aim to ensure that:

- All staff are aware of their statutory responsibilities with respect to safeguarding and will make informed and confident responses to specific safeguarding issues.
- Appropriate action is taken in a timely manner to safeguard and promote children’s welfare.
- Children and young people will be provided with appropriate safety and protection whilst in the care of Navigators.

This policy is based on the Department for Education’s statutory guidance, Keeping Children Safe in Education 2025 and Working Together to Safeguard Children 2023 (updated 2025), and the Ofsted Independent Schools Standards 2014. We comply with this guidance and the procedures set out by our local safeguarding children board.



2. Statutory Guidance and Legislation

This policy is also based on the following legislation: Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of students.

The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques.

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.

Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18 Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.

The Childcare (Disqualification) Regulations 2009 (and 2018 amendment) and Childcare Act 2006, which set out who is disqualified from working with children.

Our policy ensures that we work in partnership with other organisations, where appropriate, to identify any concerns about child welfare and take action to address them and that we comply with local policies, procedures and arrangements. Our policy complements and supports other relevant policies in the organisation.

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. Abuse is a form of maltreatment of a child or young person and may involve inflicting harm or failing to act to prevent harm. Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect and abuse in more detail.

The term child or children includes **everyone** under the age of 18.

4. Equality statement

Some young people have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may

face.

We give special consideration to children who:

- Have special educational needs or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers.

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all at Navigators and is consistent with the procedures of each LA we work with along with national legislation.

All staff will:

- read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education 2025, and review this guidance at least annually.
- follow our agreed Staff Code of Conduct
- be open and honest and adhere to the self-declaration regarding to the Childcare (Disqualification) Regulations 2009 (and 2018 amendment) and Childcare Act 2006,



which set out who is disqualified from working with children.

- attend training and briefings as required to ensure they are aware of signs of abuse/neglect and other necessary safeguarding updates
- provide a safe environment for young people
- be approachable to children and respond appropriately to any allegations
- attend multi agency meetings if appropriate to their role
- contribute to the teaching of safeguarding in the curriculum as required

Navigators staff will be aware of:

- Our systems which support safeguarding, including the staff code of conduct, the role of the designated safeguarding lead (DSL), the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation, appendix 4 of this policy outline in more detail how staff are supported to do this.

The designated safeguarding lead (DSL) at Navigators DSL is Laura McGrath. The DSL takes lead responsibility for child protection and wider safeguarding. During term time, the DSL or a DDSL (Laura McGrath, Jo McManus, Chloe Hamer, Danielle



Hewlett or Nina Lethbridge) will be available during operational hours for staff to discuss any safeguarding concerns. Outside of school hours/term time Laura McGrath is contactable via email at laura@navigators.org.uk. When the DSL is absent, the Deputy DSLs will act as cover. The DSL will be given the time, funding, training, resources and support to:

- Act as the first point of contact with regards to all safeguarding matters
- Keep up to date with changes in local policy and procedures, be aware of any guidance issued by DfE concerning safeguarding and update Navigators policies/procedures if necessary including having an awareness of and evidence of response to the LA safeguarding boards current priorities which are outlined in the (See appendices)
- Provide support and training for staff and volunteers via staff meetings, bulletins etc.
- Ensure that all referrals made to Children's Services are effective and in line with all local authorities safeguarding children boards/partnership procedures.
- Ensure that all staff with specific responsibility for safeguarding children, receive the appropriate supervision to undertake this role. Regular safeguarding meetings are held with the team.
- Ensure that all staff and volunteers understand and are aware of our reporting and recording procedures and are clear about what to do if they have a concern about a child.
- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- The DSL will also keep the head of provision informed of any issues, and liaise with



local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL are set out in their job description.

Head of Alternative Provision

The Head of Alternative Provision is responsible for the implementation of this policy, including:

- The policies and procedures to safeguard and promote the welfare of students are fully implemented and followed by all staff, including volunteers and that they are regularly updated in response to local practice or national changes in legislation.
- All staff and volunteers understand and comply with our Code of Conduct.
- We evaluate our safeguarding policies & procedures at least on an annual basis - this will be done by Laura McGrath.
- A Designated Senior Member of staff, known as the DSL, for child protection is identified and receives appropriate on-going training, support and supervision as well as sufficient time and resources to enable them to discharge their responsibilities.
- Parents/carers are aware of and have an understanding of our responsibilities to promote the safety and welfare of its students by making our statutory obligations clear in our prospectus.
- The Safeguarding and Child Protection policy is available on our website and is included in the staff handbook and volunteers' handbook.
- Child friendly information of how to raise a concern/make a disclosure is shared with young people using the organisation.
- We co-operate fully with ALL LA Safeguarding boards with whom our students are under. Arrangements are in place to monitor the quality of referrals and interventions by the designated safeguarding lead.
- We create a culture whereby all staff, volunteers and visitors feel confident and have knowledge of how to raise a concern about poor or unsafe practice in regard to the



safeguarding and welfare of the children and such concerns are addressed sensitively and effectively.

- Any staff commissioned from external agencies/ organisations have been DBS checked and their employing organisations have safeguarding policies in place, including safer recruitment and annual safeguarding training appropriate to roles.
- We have appropriate procedures to ensure that there is no risk to children from visitors and we exercise diligence and prevent any organisation or speaker from using our facilities to disseminate extremist views or radicalise students and staff. Any concerns would be reported to the Designated Safeguarding Lead.
- This policy is communicated to parents when their child joins the Navigators and via the Navigators website
- They act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

6. Confidentiality

Staff will always endeavour to seek the consent from parents to share information unless to gain places a child at risk.

Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests. Confidentiality is also addressed in this policy with respect to record-keeping in section 12.

7. Recognising abuse and acting appropriately

Staff and volunteers must follow the procedures set out below in the event of a safeguarding issue. If a child is in immediate danger or at risk of harm a referral to



children's social care and/or the police will be made immediately. Anyone can make a referral. The DSL must be informed as soon as possible if you make a referral directly.

Salford:

A referral can be made to the Bridge Partnership on - call: **0161 603 4500** (8:30-4:30pm) out of hours contact the duty team on **0161 794 8888**

Manchester:

A referral can be made to Manchester MASH team on: **0161 234 5001** (24hour)

Bury

A referral can be made to Bury MASH team on **0161 253 5678** or outside of office hours the Emergency Duty Team on **0161 253 6606**.

A referral for an adult can be made on **0161 253 5151** or on **0161 253 6606** before 8:45am and after 5:30pm. Professionals can also

email adultcareservices@bury.gov.uk. or fill in the online form on

<https://burysafeguardingpartnership.bury.gov.uk/index.aspx?articleid=14747>

Bolton

If you are worried about a child that lives in Bolton, you can contact us and speak to a Social Worker by calling **01204 331500** and pressing Option 2. Our phone lines are open Monday to Friday - 8:45am to 5pm. For out-of-hours or bank holidays, can call the Emergency Duty Team on 01204 337777.

East Cheshire

CHECS@cheshireeast.gov.uk

0300 1235012 – 8am-5pm

0300 123 5022 – Emergency Duty Team (Out of Hours)

If you have a safeguarding concern and the phone lines are Out of Order and there is no automated message that guides you through to the service you wish to reach, please contact the below phone numbers:

07784492174



07814369297

07966305353

Further advice can be found at – <https://www.gov.uk/report-child-abuse-to-localcouncil>

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. **Do not promise to keep it a secret**
 - Inform a member of the safeguarding team **immediately**. Write up your conversation onto CPOMS as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it. Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so

If you discover that FGM has taken place or a student is at risk of FGM, KCSIE explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’. Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4. Any teacher who discovers that an act of FGM appears to have been carried out on a student under 18 must immediately report this to the police, personally. This is a mandatory duty; staff will face disciplinary sanctions for failing to meet it. The duty above does not apply in cases where a student is at



risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students. Any member of staff who discovers that an act of FGM appears to have been carried out on a student under 18 must speak to the DSL and follow our local safeguarding procedures.

If you have concerns about a child (as opposed to a child being in immediate danger). Figure 1(p.15) illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger. Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly. You can also contact the charity NSPCC on 0800 028 0285 if you need advice on the appropriate action or have a concern with the organisation.

If you have concerns about extremism and the child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, that Navigators staff can call to raise concerns about extremism with respect to a student.

You can also email counter.extremism@education.gov.uk or use Salford's Prevent referral form <https://contactus.salford.gov.uk/?formtype=PREVENTREF>

Note that this is not for use in emergency situations. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger

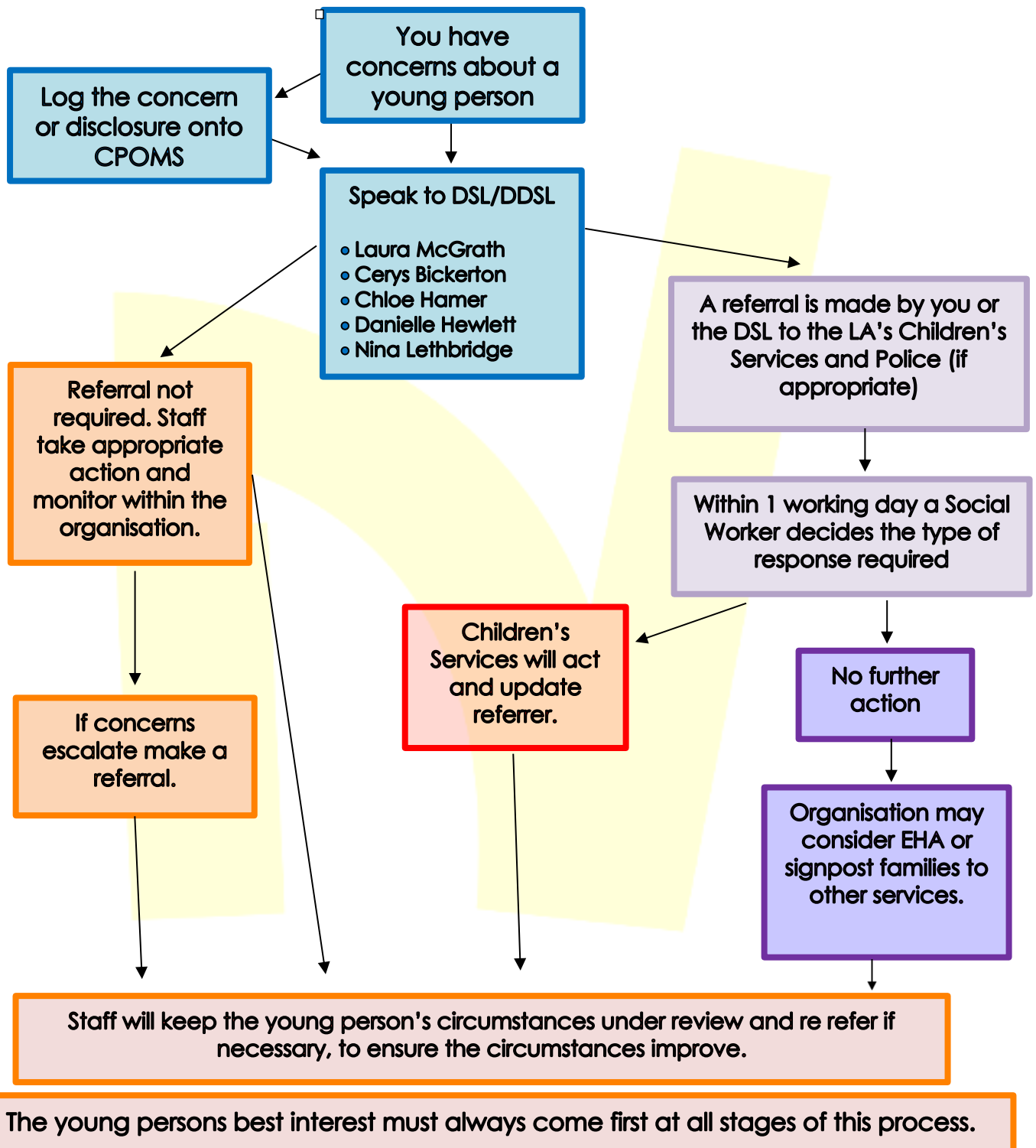
Navigators

- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related



Navigators

Figure 1: procedure if you have concerns about a child's welfare (no immediate danger)





8. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL or deputies will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any concerns following consultation with the DSL. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

9. Whistleblowing/Allegations towards staff

We ensure that all staff are aware of how to raise a concern regarding poor or unsafe practice or potential failures through our Whistleblowing policy. The policy outlines what options there are for reporting concerns. How the organisation will respond to such concerns and what protection is available to staff who report another member of staff. If you have concerns about a member of staff or volunteer, speak to the head of centre or the DSL immediately. If you have concerns about the headteacher, speak to the DSL. You can also discuss any concerns about any staff member or volunteer with the DSL. The head of AP or DSL or HR will then follow the procedures set out in appendix 3, if appropriate. The DSL or Head of AP will also inform the designated officer for the local authority (LADO). Where appropriate, the organisation will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

10. Allegations of abuse made against other students: Child on child abuse, Sexual violence or Harassment

To be read in conjunction with the Child on Child abuse policy and the Sexual Harassment policy.

We recognise that children are capable of abusing their peers. We have a zero-

tolerance approach to child on child abuse. It will not be minimised or passed off as “banter” or “part of growing up”. Most cases of students hurting other students will be dealt with under our organisations behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put students in the organisation at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting)

If a student makes an allegation of abuse against another student:

- You must tell the DSL and record the allegation, but do not investigate it
 - The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
 - The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed

We will minimise the risk of child-on-child abuse by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys. We understand that these behaviours are not gender specific.
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent. Students bespoke curriculums will be reviewed and developed in line with their needs, behaviour and lived experience.



- Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

Any child may benefit from early help at times, but all staff will be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs.
 - has special educational needs (whether or not they have a statutory education, health and care plan).
- is a young carer.
- is misusing drugs or alcohol.
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
 - is an international new arrival, refugee or asylum seeker
- is looked after, previously looked after or under a special guardianship order. The DSL will keep the case under constant review and the organisation will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

11. Attendance

We view poor attendance as a safeguarding issue and in accordance with our Attendance Policy and Working Together to Improve School Attendance 2024, absences are rigorously pursued and recorded. In partnership with the appropriate agencies, we take action to pursue and address all unauthorised absences in order to safeguard the welfare of children in our care. Our Attendance Policy identifies how individual cases are managed and how we work proactively with parents/carers to ensure that they understand why attendance is important.

12. Record-keeping

We will hold records in line with our GDPR policy. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on CPOMS. This creates an accurate, timely chronology and allows a full picture of the child's needs to be gained. If you are in any doubt about whether to record something, discuss it with the DSL. We keep copies of all referrals to Children and Family services, the Early Help hub and any other agencies related to safeguarding children. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. We send a student's child protection or safeguarding file separately from the main file to a new establishment if a student leaves the organisation and keep a copy of the file. Files can be transferred by CPOMS securely if the child's new setting has access to this. Safeguarding records relating to individual children will be retained for a period of time until the person reaches their 26th birthday after they have left the organisation.. This is in line with NSPCC recommendations 2018. Navigators will share information with other agencies when this is deemed appropriate.

We share information inline with [DofE Information Sharing Guidance](#).

13. Multi-Agency Working

We will develop effective links with other relevant agencies and co-operate as required with any enquiries regarding child protection issues. We will notify Children's Social Care if:

- a child subject to a child protection plan is at risk of permanent exclusion.
- there is an unexplained absence of a child who is subject to a child protection plan of more than two days from school.
- it has been agreed as part of any child protection plan or core group plan.

14. Training

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the organisations safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding children board. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually. Volunteers will receive appropriate training, if applicable.

The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

15. Staff who have contact with students and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues. This will be done by the member of staff's line manager.

16. Serious Case Review

LA's Children's Safeguarding Board will always undertake a serious case review when a child dies (including death by suicide), and abuse or neglect is known or suspected to be a factor in their death. If required, we will cooperate fully with the review process. Our DSL will keep up to date with the findings from SCRs in the local authorities we work with and share the learning and review our safeguarding procedures if relevant.

The DSL will conduct internal case reviews when Navigators students are involved or linked to any serious incidents.

17. The Curriculum

We are committed to promoting emotional health and well-being and to supporting the development of the skills needed to help children keep themselves safe and healthy, develop their self-esteem, develop resilience and understand the responsibilities of adult life. All children have access to an appropriate curriculum, differentiated to meet their needs. They are encouraged to express and discuss their ideas, thoughts and feelings through a variety of activities and have access to a range of cultural opportunities which promote the fundamental British values of tolerance, respect and empathy for others. This enables them to learn to develop the necessary skills to build self-esteem, respect others, defend those in need, resolve conflict without resorting to violence, question and challenge and to make informed choices in later life. Personal Health and Social Education and Citizenship lessons and our PDC provide opportunities for young people to discuss and debate a range of subjects including lifestyles, knowing and understanding when they are at risk, how to keep themselves safe and how to get help if they need it. We take account of the latest advice and guidance provided to help address specific vulnerabilities, risks and forms of exploitation e.g. CSE, Radicalisation and Extremism, Modern Slavery, County Lines,



Female Genital Mutilation, Forced Marriage.

18. Digital safeguarding/E Safety/Online Safety

E-Safety is a safeguarding issue not an ICT issue. We aim to equip our young people to develop critical thinking, digital resilience in our curriculum and recognising online dangers such as phishing, scams and grooming. We will ensure that appropriate filtering methods are in place to ensure that children are safe from all types of inappropriate and unacceptable materials, including terrorist and extremist material, conspiracy theories, fake news – misinformation and disinformation.

19. Filtering and Monitoring

As highlighted in the filtering and monitoring standards (DfE, 2023) and Cyber security standards for schools and colleges (DfE,2023) all staff will be made aware of filtering and monitoring systems in place. Navigators have filtering systems and firewalls uploaded on all devices and servers to ensure students and staff are protected from harmful/inappropriate material online.

Navigators work with APEX to ensure filtering and monitoring systems are in place. Navigators use sonic wall for filtering and monitoring systems. SonicWall is a member of the IWF and receives updates on websites that need to be banned.

The DSL and APEX will meet termly to review systems to ensure strategic oversight. APEX will also alert the DSL should any concerns arise in real time

The CEO and Executive Head Team will ensure that these systems are in place with the DSL. The DSL will take the lead on reporting any safeguarding concerns, adding



to the 'blocked list' to check the filtering and monitoring systems are appropriate as well as providing filtering and monitoring reports to the board of strategic leads where necessary.

20. Safer Recruitment

Our recruitment and selection policies and processes adhere to DfE guidance Keeping Children Safe in Education 2025. See Appendix 2.

At least one person on any interview/appointment panel for a post at the organisation. will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education 2025, and be in line with local safeguarding procedures.

21. RSHE and Gender Questioning Children

AWAITING PUBLICATION IN SEPTEMBER 2025

22. Alternative Provision and Relationships with School

The safeguarding team will work with the host school to ensure that students safeguarding provisions are a high standard. Host schools should ensure that Navigators safeguarding provisions are appropriate performing QA's prior to referral.

Host schools should make Navigators aware of the students whereabouts when they are not in Navigators provision ensuring they receive a full educational offer.

Host schools should review the students programme regularly with Navigators team.

Navigators

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2025

Appendix 1:

Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Emotional abuse may involve: Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. Seeing or hearing the ill-treatment of another. Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve: Physical contact, including assault by penetration (for example rape or oral sex) or

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

Appointing new staff When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate

- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Ask for written information about previous employment history and check that information is not contradictory or incomplete
- We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.
- We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought. If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff.

Appendix 3: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

It applies regardless of whether the alleged abuse took place in the organisation.

Allegations against a member of staff who is no longer teaching and historical allegations of abuse will be referred to the police and LADO. We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation working closely with LADO to ensure our practices are in line with them also. Our procedures for dealing with allegations will be applied with common sense and judgement. Further information can be found in the organisations Whistleblowing policy and Low Level Concern Policy.

Appendix 4: Specific Safeguarding Issues .

- Children missing from education - A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation. There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

Are at risk of harm or neglect

- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks



of going missing in future. This includes informing the local authority if a child leaves the organisation without a new placement/school being named.

Please see Navigators attendance policy for further detail. Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage. If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is in immediate danger or at risk of harm.

• **Child sexual exploitation** - Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status. This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour

- Suffering from changes in emotional wellbeing – withdrawn, aggressive, defensive, isolation etc....

- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education
- Self harm, poor mental health
- Weight loss or gain
- Overnight stays
- Unexplained injuries

- **Child Criminal Exploitation / County Lines** - Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.



Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources. If a member of staff suspects a child is being exposed to or is at risk of criminal exploitation, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Serious violence/Youth violence - All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from education, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance

Domestic abuse – Navigators are aware that children and young people's development, as well as their social and emotional resilience, is affected by many factors including exposure to domestic abuse within the family situation and is a safeguarding issue. Children and young people react to domestic abuse in similar ways to other types of abuse and trauma. Our Safeguarding and Child Protection's Policies and Procedures will be used to protect children and young people exposed to and at risk from, domestic abuse. Any child or young person thought to be at immediate risk will be reported without delay to the police service as a 999 emergency

and the Child's local Children's Service Contact Centre will be contacted as soon as possible.

Female Genital Mutilation (FGM) - The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM. Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM. Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl: Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from education, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a student may be at risk of FGM include:

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider)
- FGM being known to be practiced in the girl's community or country of origin

- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
 - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
 - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
 - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
 - Being unexpectedly absent from education
 - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication
- The above indicators and risk factors are not intended to be exhaustive.

Forced marriage - Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘one chance’ rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them. If a member of staff suspects that a student is being forced into marriage, they will speak to the student about their concerns in a secure and private place. They will then report this to the DSL. The DSL will:

- Speak to the student about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmf@fco.gov.uk
- Refer the student to the Pastoral Lead

Other so called 'Honour Based' Violence - So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV. If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the DSL (or deputies) as appropriate they will activate local safeguarding procedures.

Radicalisation - Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. Alternative Provisions have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk. We will ensure that suitable internet filtering is in place, and equip our students to stay safe online at school and at home. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be

alert to changes in students' behaviour. The government website Educate Against Hate and charity NSPCC say that signs that a student is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong. Staff should always take action if they are worried.

Homelessness- Being homeless or being at risk of becoming homeless presents a real risk to a young persons welfare. The DSL (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at

risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Child on child abuse - Children can abuse other children. This is generally referred to as child on child abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals. Youth Produced sexual imagery / Sexting This refers to the creating and sharing of sexual imagery by young people.

Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of safeguarding risks which need careful management. The term 'youth-produced sexual imagery' (YPSI) is now used instead of 'sexting.' This is to ensure clarity. The types of incidents which this covers are those where a person under the age of 18:

- creates and shares sexual imagery of themselves with a peer under the age of 18
- shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult

- is in possession of sexual imagery created by another person under the age of 18

As it is a criminal offence to possess, distribute, show and make indecent images of children, any disclosure of information about an incidence of YPSI will always be taken very seriously by the organisation. The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.



When an incident involving youth-produced sexual imagery comes to the organisation's attention:

- the incident should be referred to the DSL as soon as possible
- the DSL will hold an initial review meeting with appropriate staff
- there will be subsequent interviews with the young people involved (if appropriate)
- parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. At any point in the process if there is a concern that a young person has been harmed or is at risk of harm, a referral will be made to Children's Social Care and/or the police immediately.

An immediate referral to police and/or Children's Social Care will also be made if at this initial stage, if:

- the incident involves an adult
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
- what is known about the imagery suggests violent content
- the imagery involves sexual acts and any child in the imagery is under 13
- there is reason to believe a young person is at immediate risk of harm because of the sharing of the imagery, e.g. the young person is presenting as suicidal or self-harming.

If none of the above applies, Navigators may decide to respond to the incident without involving the police or Children's Social Care. The decision to respond to the incident without involving the police or Children's Social Care will be made in cases when the DSL is confident that:



- there is enough information available to assess the risks to students involved, and
- the risks can be managed within the organisations pastoral support and disciplinary framework and, if appropriate, their local network of support.

The decision will be made by the DSL, in consultation with the Head of AP. Input from other members of staff will be considered, if appropriate. The decision will be recorded, in accordance with organisations policy. Any decision will be in line with the organisations child protection procedures and will be based on consideration of the best interests of the young people involved. This will take into account proportionality as well as the welfare and protection of the young people. The decision will be reviewed throughout the process of responding to the incident. Searching, securing and handing over devices to the police adults should not view youth produced sexual imagery unless there is good and clear reason to do so. The decision to view imagery should be based on the professional judgement of the DSL and in line with the Safeguarding Policy. If the DSL is satisfied that no other agency needs to be involved in dealing with the case, consideration should be given to deleting the images. The student should do this under supervision. Images should never be copied printed or shared with others; this is illegal. If any devices need to be seized and passed onto the police then the device(s) should be confiscated and the police should be called. The device should be turned off and placed securely until the police are able to come and retrieve it. During the course of any investigation into YPSI the Organisation will follow the guidance published by the UK Council for Child Internet Safety.

Sexual violence and sexual harassment - Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. Sexual violence and sexual harassment exist on

a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence suggests girls, children with SEND and LGBTQ+ children are at greater risk. Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- A zero tolerance approach and never dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Youth produced sexual imagery or sexting
- initiation/hazing type violence and rituals.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they should speak to the DSL.

Private fostering - Private fostering is defined as when a child is cared for by someone who is not their parent or close relative. This is a private arrangement made by their parent/carer for 28 days or more. When private fostering is known or suspected the DSL or deputy must be made aware and a referral to the local authority

will be made.

Appendix 5 : SSCP Priorities & Three Year Strategy

<https://safeguardingchildren.salford.gov.uk/media/1841/sscp-strategy-2023-2026.pdf>

Highlighted as; Prevention, Protection, Voice of the Child, Safeguarding Effectiveness and Communication and Engagement.

Priorities:

Neglect

Exploitation

Child Sexual Abuse

Children affected by Domestic Abuse

Safeguarding babies under 1

Safeguarding adolescents

Assurance Priorities

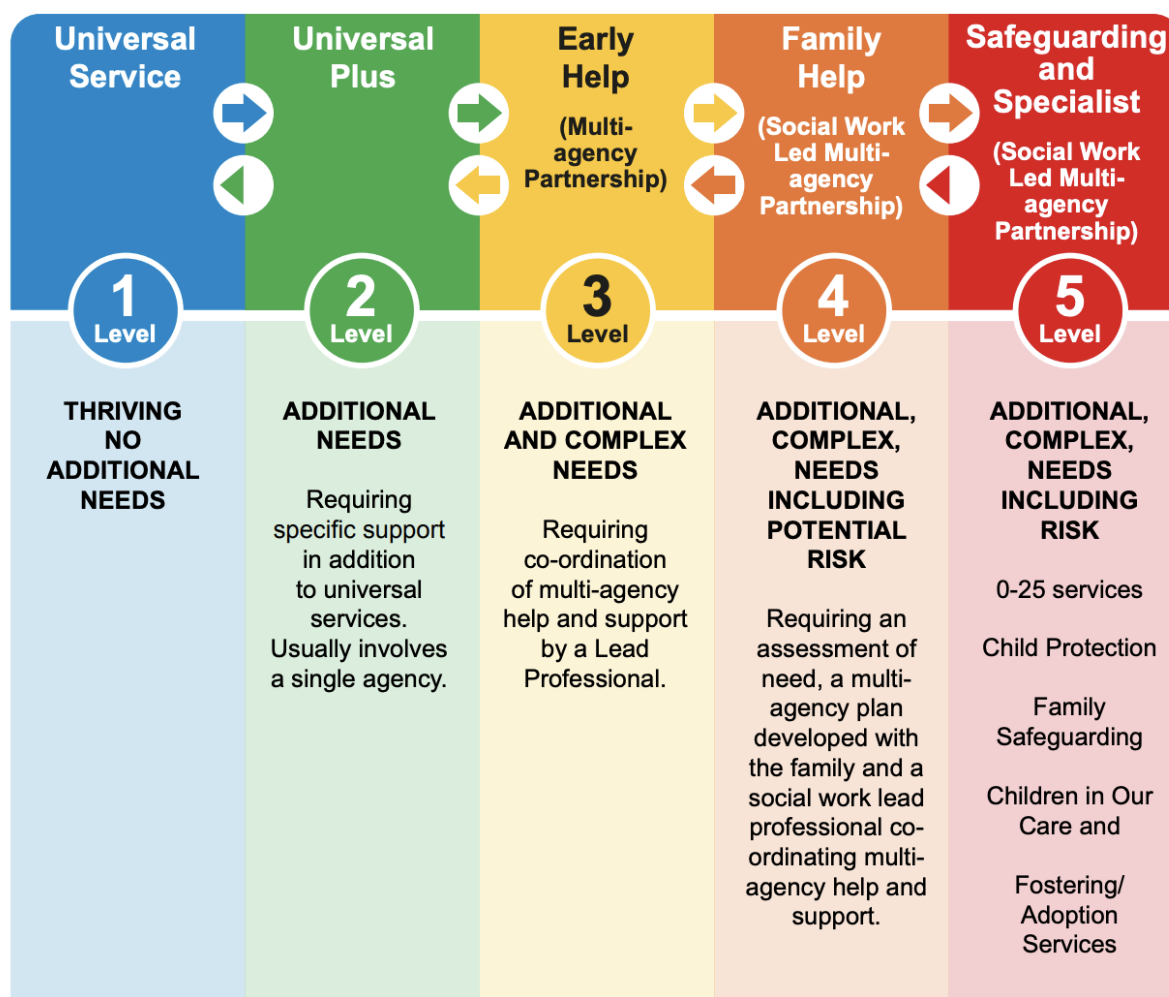
Any Salford Safeguarding updates or information will be shared by the safeguarding team who will attend SSCP training and receive SSCP circulars. The information will be shared via Teams or on Internal Newsletters.

Appendix 6:

<https://burysafeguardingpartnership.bury.gov.uk/CHttpHandler.ashx?id=20168&p=0>

Navigators

Bury Integrated Safeguarding Partnership Continuum Of Need



Appendix 7: Current MSP priorities (2025-26)

[Appendix 1 for Manchester Safeguarding Partnership MSP Annual Report 2022-2023.pdf](#)

Manchester Safeguarding Partnership's current priorities are;

- Serious Violence
- Adolescent suicide
- Identifying Neglect

Appendix 8:

<https://www.boltonsafeguardingchildren.org.uk/downloads/file/243/bolton-safeguarding-children-partnership-annual-report-2022>

Most accessible report is 2023-2024