# SchoolsGroup Education UK
# Safeguarding and Child Protection Policy

## POLICY STATMENT

SchoolsGroup Education UK recognises our moral and statutory responsibility to safeguard and promote the welfare of all children. We acknowledge that "it could happen here". We make every effort to ensure that students and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

The purpose of this policy is to provide staff, volunteers and homestays with the framework they need in order to keep children safe and secure whilst they are in our care. The policy also informs parents, agents and partner schools how we will safeguard their children whilst they are in our care.

This policy is based on guidance from the most recent versions of KCSIE and Working Together to Safeguard Children. It also makes use of guidance from the NSPCC website.

## KEY SAFEGUARDING CONTACT DETAILS

| Role | Name | Contact Number | Email |
|------|------|----------------|-------|
| Designated Safeguarding Lead (DSL) | Jessie Chang | 07356220011 | ukoffice@schoolsgroup.com |
| 24hr Emergency Contact Deputy Designated Safeguarding Lead (DDSL) | Nan Hu | 07809834932 | cbg@schoolsgroup.com |

### 24-Hour Guardian System

Each student is paired with a bilingual guardian in China and a local coordinator in the UK. Students and parents will receive full contact information upon registration.

## Table of Contents

## CHILD PROTECT PRINCIPLES

The following principles underpin our provisions and practices in relation to safeguarding and child protection:

- SchoolsGroup will provide a safe and secure environment for all students.
- Homestays and transfer companies are expected to uphold a safe and supportive setting for students at all times.
- All students should feel safe, secure, and protected from harm.

- Students must know who to turn to for advice or help, and be able to access confidential support easily, including 24-hour bilingual assistance.
- The company director has overall responsibility for student safeguarding and welfare.
- All staff, homestays, and volunteers must share responsibility for identifying and addressing safeguarding concerns and follow the company's child protection procedures.
- Students and staff should have clear and effective ways to raise child protection issues.
- Staff should have reliable methods of quickly contacting students.
- Staff should be aware of students' medical or learning needs through the Student Record, with relevant information shared with homestays on a need-to-know basis.
- Where a student is missing or thought to be at risk, staff must immediately follow the Missing Student Procedure to locate the student quickly and safely.
- The organisation has clear procedures in place to manage child protection concerns in line with legislation.

SchoolsGroup is committed to the safeguarding and protection of all children in its care. We carry out thorough checks on those who work with us, and expect all staff, volunteers, and homestays to prioritise student welfare.

Safeguarding is everyone's responsibility, whether you are a full-time, part-time, contracted, or agency member of staff—or even if your role doesn't involve regular contact with students. The same duty applies to homestays and third-party providers. When a safeguarding concern arises, SchoolsGroup will take the child's views and feelings into account before deciding on actions and services. We ensure students have clear and accessible information—such as in our handbook or on emergency cards—on how to raise a concern, and we make sure they understand their concerns will be taken seriously and sensitively.

Staff and homestays should remember that children might not be ready to talk about abuse or neglect, or might not recognise that they're being harmed. Staff should maintain professional curiosity and speak to the DSL when they have concerns.

It is important that trusted relationships are established so students feel comfortable communicating openly.

Child protection refers to safeguarding children from abuse or neglect where there is a known risk. Safeguarding includes reducing the risk of:

- Child sexual exploitation
- Child-on-child abuse
- Radicalisation and extremism
- Female genital mutilation (FGM)
- Physical, emotional, or sexual abuse and neglect
- Domestic abuse
- Online abuse
- Bullying and cyberbullying

Our goal is to ensure that students are always in a caring, secure environment where they feel safe, respected, and valued. To achieve this, SchoolsGroup commits to:

1. Ensuring senior leadership has appropriate safeguarding knowledge and oversees implementation.
2. Providing role-specific training for staff and homestays.
3. Promoting clear and honest communication between students, SchoolsGroup staff, schools, and homestays to prioritise wellbeing.
4. Responding to all reports or suspicions of abuse in line with our internal safeguarding procedures.
5. Applying safer recruitment processes and enhanced DBS checks for all who work directly with students.
6. Maintaining strong relationships with statutory agencies responsible for child welfare.

If you believe that a child in your care may be suffering any form of abuse or neglect, report your concern at once and in confidence to the DSL or DDSL using the contact details in this policy.

## SUPPORTING PROCEDURES AND DOCUMENTS

This policy should be read alongside the following supporting policies and guidance documents:

- Anti-Bullying Policy (including cyberbullying)
- Anti-Radicalisation Policy
- Online Safety Policy
- Emergency Procedure (including the organisation's approach to foreseeable emergencies such as a pandemic)
- Low-Level Concerns Policy
- Missing Student Policy
- Safer Recruitment Policy
- Staff and Homestay Code of Conduct
- Whistleblowing Policy

### GOVERNMENT GUIDANCE

- Keeping Children Safe in Education (2024)
- Working Together to Safeguard Children (2023)

### KEEPING CHILDREN SAFE IN EDUCATION

Part one of *Keeping Children Safe in Education (2024)* provides essential safeguarding guidance for staff, homestays, and volunteers working with children. While it is written primarily for schools and colleges, the guidance is also applicable to guardianship organisations and host families. SchoolsGroup advises all relevant staff, homestays, and volunteers who interact with children to read this document. It can be accessed here:

Keeping children safe in education (2024) – GOV.UK

Annex A of the document is a shortened version of Part One. Staff who do not work directly with children may read Annex A in place of the full section.

# DEFINITIONS

| Term | What this means |
|---|---|
| **Safeguarding and promoting the welfare of children** | Protecting children from maltreatment; preventing impairment of mental and physical health or development; ensuring children grow up with safe and effective care; and taking action to enable the best outcomes. |
| **Child Protection** | A specific aspect of safeguarding referring to the action taken to protect children suffering or at risk of significant harm. |
| **Designated Safeguarding Lead (DSL)** | The person appointed to lead on safeguarding matters in an organisation, trained to a higher safeguarding standard. |
| **Prevent** | A strand of the UK government's counter-terrorism strategy aimed at preventing radicalisation. |
| **Local Safeguarding Partnership (LSP)** | A multi-agency body replacing Local Safeguarding Children Boards (LSCBs), involving local authorities, police, and health services. |
| **LADO** | Local Authority Designated Officer responsible for overseeing allegations against adults working with children. |
| **Children** | All individuals under the age of 18. |

# WHAT IS ABUSE AND NEGLECT?

- Recognising the signs of abuse and neglect is crucial for early intervention. All staff and homestays should be familiar with indicators and speak to the DSL or DDSL if unsure.
- Abuse, neglect, and safeguarding concerns often involve multiple, overlapping factors. They rarely fit into one category.
- *Contextual Safeguarding*: Staff, volunteers, and homestays should consider risks outside the family or school context—such as peer abuse, exploitation, county lines, or online harm.
- Technology is increasingly central in safeguarding concerns. Children may face risks both online and offline. Abuse may include harassing messages, non-consensual sharing of images, or exposure to inappropriate content.
- Children may also perpetrate harm online toward peers, including through group chats or digital media.

All concerns—no matter how uncertain—should be shared with the DSL or DDSL without delay.

# TYPES OF ABUSE AND NEGLECT

(*Adapted from Keeping Children Safe in Education, 2024*)

**Abuse** is a form of maltreatment of a child. A person may abuse or neglect a child by causing harm or by failing to act to prevent harm. Harm may include non-physical ill-treatment, such as the emotional impact of witnessing abuse. Children can be abused in a family, institutional, or community setting, by known individuals or, more rarely, by strangers. Abuse can occur wholly online, or technology may be used to facilitate offline abuse. Abuse may be committed by adults or by other children.

**Physical abuse** involves actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. It may also include inducing illness or fabricating symptoms of illness in a child.

**Emotional abuse** is the persistent maltreatment of a child that causes severe and adverse effects on emotional development. This could involve making a child feel worthless, unloved, or only valued when meeting someone else's needs. It may include not allowing the child to express themselves, imposing inappropriate expectations, overprotection, limiting learning opportunities, or preventing social interaction. Witnessing the abuse of others, serious bullying (including cyberbullying), and exploitation also fall under emotional abuse. All forms of maltreatment involve some degree of emotional abuse.

**Sexual abuse** includes forcing or enticing a child to engage in sexual activities, whether or not the child is aware of what is happening. This may include contact acts (e.g., rape, oral sex, touching) or non-contact acts (e.g., exposing children to sexual content or encouraging inappropriate behaviour). Sexual abuse can take place online or offline and is not limited to adult males—women and other children may also be perpetrators. The sexual abuse of children by other children is a recognised safeguarding concern. Staff must be aware of their organisation's policies for managing such cases.

**Neglect** is the ongoing failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of the child's health or development. It may occur during pregnancy (e.g., due to maternal substance misuse), or after birth, such as failing to:

- Provide adequate food, clothing, or shelter (including exclusion or abandonment);
- Protect from physical and emotional harm or danger;
- Ensure appropriate supervision (including unsuitable caregivers);
- Provide access to medical care or treatment;
- Respond to a child's emotional needs.

All staff and homestays should understand the indicators of abuse and neglect and raise concerns promptly with the DSL or DDSL if in doubt. Abuse rarely occurs in isolation—multiple issues may overlap, and safeguarding responses must be comprehensive and contextual.

(For specific types of abuse, please see the additional information at the end of this policy.)

# SIGNS OF ABUSE AND NEGLECT

(*Based on guidance from the NSPCC: https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/*)

This section provides guidance on common signs that may indicate abuse or neglect. More detailed information on specific forms of abuse—including child sexual exploitation, trafficking, criminal exploitation, domestic abuse, FGM, grooming, non-recent abuse, and online abuse—is also available on the NSPCC website.

Common signs may include:

- Unexplained changes in behaviour or personality
- Becoming withdrawn or anxious
- Sudden aggression or irritability
- Lack of social skills or few/no friends
- Poor relationship with parent or caregiver
- Knowledge of adult topics inappropriate for age
- Running away or going missing
- Consistently wearing clothes that cover the body

These signs do not always indicate abuse. However, persistent or multiple concerns should always be reported.

Concerning behaviour from adults responsible for children should also be noted and reported where there is concern for a child's wellbeing.

## Indicators of Physical Abuse

- Bruises, burns, scalds, bite marks
- Fractures or broken bones
- Poisoning symptoms (vomiting, drowsiness, seizures)
- Breathing problems from suffocation or drowning
- Head injuries in infants (e.g., swelling, fractures, unusual behaviour)

## Indicators of Emotional Abuse

- Low self-esteem or confidence
- Difficulty managing emotions or forming relationships
- Inappropriate behaviour or knowledge for their age
- Extreme emotional outbursts
- Social withdrawal or lack of friendships

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2024-2025

## Indicators of Sexual Abuse

*Emotional and behavioural signs:*
- Fear of being alone with certain individuals
- Sexualised language or behaviour
- Nightmares or bed-wetting
- Substance misuse or self-harm
- Disordered eating

*Physical signs:*
- Genital injuries, pain, discharge, STIs, or pregnancy

## Online sexual abuse indicators

- Increased secrecy around internet use
- Change in mood after going online
- New contacts or phone numbers

Children may also give subtle hints about abuse. These should always be taken seriously.

## Indicators of Neglect

*Poor hygiene and appearance:*
- Dirty, smelly, or unwashed clothes
- Inappropriate clothing for the weather
- Constant hunger or no lunch money

*Health and development concerns:*
- Anaemia, poor muscle tone, dental issues
- Missed medical appointments or vaccinations
- Regular illness or infections
- Untreated injuries or unexplained accidents

*Behavioural or emotional changes:*
- Aggression, clinginess, anxiety, or depression
- Difficulty concentrating
- Absenteeism or disengagement from school
- Signs of self-harm or substance misuse

*Family or living conditions:*
- Poor housing or unsafe living conditions
- Being left alone or caring for siblings unsupervised

All signs should be considered in context. When in doubt, speak to the DSL or DDSL immediately.

# PROCEDURES

When new staff, volunteers or homestays join our organisation, they are informed of the safeguarding arrangements in place, the name of the DSL (and DDSL) and how to share concerns with them. Please note that the usual reporting channel is via the DSL, however anyone can make a referral direct to the LSP or LADO. The contact details are included in this document.

SchoolsGroup will self-report to AEGIS by promptly informing them of any significant safeguarding concerns, incidents that could be perceived as compromising or subject to misinterpretation, or instances where behaviour falls below expected standards. This will be done through formal communication channels to ensure transparency and compliance with safeguarding regulations.

## Actions to be followed if there are concerns about a child or young person

- All staff members and homestays have a duty to identify and respond to suspected/actual abuse or disclosures of abuse. Any member of staff, volunteer or homestay who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the DSL (or, in their absence, the DDSL).
- Where there is risk of immediate harm, concerns will be referred immediately by telephone to the LSP or the Police.
- Less urgent concerns or requests for support, including for Early Help, will be sent by the DSL to the LSP.
- The DSL may also seek advice from Social Care or another appropriate agency about a concern, if we are unsure how to respond to it.
- The DSL will refer any safeguarding concerns that relate to an incident in school to the school. Concerns will be referred to the school DSL. If an allegation is made against a member of school staff, the guardianship organisation will check the school policy to see who to refer such matters to. This is usually the Head of the School. If the allegation involves the Head, then usually the Chair of Governors should be informed.
- Where a concern is not seen to reach the threshold for a referral, the DSL will keep the concern on file and will monitor the situation. Should the concern escalate, a referral will be made to the LSP.
- Wherever possible, we will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to consult with the LSP and/or Police for advice on when to share information with parents/carers.
- If a member of staff or homestay continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, the staff member or homestay concerned should press for re-consideration of the case with the designated safeguarding lead.
- If, for any reason, the DSL (or DDSL) is not available, or you do not feel that your concern is being taken seriously, this should not delay appropriate action being taken. Any individual may refer to the LSP or Police where there is

suspected or actual risk of harm to a child. The contact details are included at the beginning of this policy.
- Full records of reports and action taken will be maintained by the DSL and securely stored in a specific safeguarding file.

## Child-on-Child Abuse

All staff and homestays should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it can happen both inside and outside of school or college and online. That may mean it happens whilst students are in the care of homestays. It is important that all staff and homestays recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff and homestays should understand that even if there are no reports in their organisation, it does not mean it is not happening—it may be the case that it is just not being reported. As such, if staff or homestays have any concerns regarding child-on-child abuse, they should speak to the designated safeguarding lead (or deputy).

SchoolsGroup adopts a zero-tolerance approach to abuse. It is essential that all staff and homestays understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter," "just having a laugh," "part of growing up," or "boys being boys," can lead to a culture of unacceptable behaviours, an unsafe environment for children and—in worst case scenarios—a culture that normalises abuse and discourages children from reporting.

It is recognised that it is more likely that girls will be victims and boys perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse is most likely to include, but may not be limited to:
- Bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent
- Consensual and non-consensual sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery)
- Upskirting
- Initiation/hazing type violence and rituals (including online elements)

## Preventative Measures Against Child-on-Child Abuse:
- Regular training for staff and homestays

- Educating students through our handbooks and through discussion
- Providing students with clear guidelines within the Student Handbook on how to raise a concern
- Fostering effective channels of communication so that students feel comfortable approaching their homestay carer or guardian with any concerns
- Effective communication between the DSL (and DDSL) and the DSLs in schools where students are placed

In the event of a report of child-on-child abuse, staff and homestays should inform the DSL or DDSL as soon as possible.

## How students can raise a concern

- It is important that students understand that any concern they raise will be treated seriously.
- Students will be encouraged to talk to any trusted adult, including school staff, their parents, homestay carer, their guardian or the guardianship organisation DSL/DDSL. This will be explained to them verbally, with a written reminder included in the Student Handbook.

## Responding to and Managing Allegations

- All reports of child-on-child abuse will be made on a case-by-case basis with the DSL or the DDSL taking a leading role, using their professional judgement and supported by other agencies such as social care or the police as required.
- Staff and homestays are expected to follow the procedures outlined within this policy.
- Where a report includes an online element, SchoolsGroup will follow advice on searching, screening and confiscation. Staff or homestays must not view or forward images unless unavoidable and only if another member of staff (preferably the DSL) is present. (See DfE guidance Section 2.10 for the appropriate procedure.)
- The DSL will notify the DSL of the school that the student attends as soon as possible.

## Risk Assessment

When there has been a report of sexual violence, the DSL (or DDSL) will make an immediate risk and needs assessment. For reports of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The assessment should consider:

- The victim, especially their protection and support
- The alleged perpetrator
- All other children (and, if appropriate, homestay family members) residing at the homestay

Risk assessments will be recorded [written or electronic—say where these are filed] and kept under review. The DSL (or DDSL) will ensure they are engaging with their LSP.

## Support for Students Involved in Child-on-Child Abuse

SchoolsGroup will support students who have been involved in child-on-child abuse. This may include:

- Maintaining regular contact with the student(s) to check on their welfare
- Providing staff and homestays with relevant information (on a need-to-know basis)
- Liaising with the student's school to provide coordinated support
- Making available details of helplines and specialist support organisations

## Management of the report

The DSL will decide how each case of child-on-child abuse should be managed, in line with LSP thresholds. Depending on the severity, a report may be managed by:

- Internal management (including liaison with the school DSL where appropriate)
- Early help
- Referral to the LSP where a child is at risk or has been harmed
- Referral to the police in cases involving serious sexual offences

SchoolsGroup expects all staff and homestays to understand and follow the procedures in this policy. Addressing inappropriate behaviour early can prevent future incidents of abuse.

# Allegations Involving Adults in a Position of Trust

## Allegations that meet the harm threshold

The following applies if it is alleged that anyone working, volunteering, or hosting students for SchoolsGroup:

- Has behaved in a way that has harmed a child or may have harmed a child;
- May have committed a criminal offence against or related to a child;
- Has behaved towards a child or children in a way that indicates they may pose a risk of harm;
- Has behaved or may have behaved in a way that indicates they may not be suitable to work with children (this is referred to as transferable risk).

In such cases:

- SchoolsGroup will follow the statutory guidance outlined in Part 4 of the most recent edition of *Keeping Children Safe in Education*.
- Allegations must be reported to the company director, who will act as the designated case manager. The director will contact the Local Authority Designated Officer (LADO) immediately and follow their instructions. No internal investigation should take place at this stage.
- If the allegation concerns the company director, the LADO should be contacted directly.
- Where an individual is removed from regulated activity due to harm or risk of harm to a child, a referral will be made to the Disclosure and Barring Service (DBS).
- Historical allegations will be referred directly to the police.

## Allegations that do not meet the threshold (Low-Level Concerns)

SchoolsGroup's Low-Level Concerns Policy outlines how concerns that do not meet the harm threshold are to be managed. The Staff Code of Conduct provides guidance on professional boundaries expected of all staff, volunteers, and homestays.

A low-level concern refers to any behaviour that:

- Is inconsistent with the Staff Code of Conduct, including conduct outside of work;
- Is not serious enough to require referral to the LADO.

Examples of low-level concerns may include:

- Being overly familiar or friendly with children;
- Showing favouritism;
- Taking photographs of students using a personal mobile phone;
- Spending time alone with a student in a secluded area;
- Using inappropriate, sexualised, intimidating, or offensive language.

Such behaviour may be unintentional, thoughtless, or misunderstood—or it may represent an early warning sign of a deeper issue. All low-level concerns must be reported to the DSL or director. Our Low-Level Concerns Policy provides further detail on how these will be recorded, reviewed, and acted upon.

## Learning from allegations and concerns

Following a substantiated allegation, the case manager and LADO will review the case to identify any improvements to procedures and policies, including:

- The decision to suspend and its justification;
- How the suspension was managed and whether support was needed on reinstatement;
- Whether future similar cases could be managed differently.

Even where an allegation is determined to be unfounded, false, malicious, or unsubstantiated, the case manager and, if involved, the LADO should still review the matter for lessons learned.

## Receiving a disclosure from a child or young person

If a student discloses abuse:

- Always take the disclosure seriously and ensure the child feels safe.
- Reassure the child and confirm they are being listened to.
- Do not promise confidentiality—you are required to share the information to protect them.
- Record the disclosure in detail as soon as possible.
- Ask open questions only (e.g. "tell me," "describe," "explain") and avoid leading or investigative language.
- Avoid asking "why," "how," or "what happened"—leave this to trained professionals.
- Call 999 if the child is in immediate danger.
- Notify the DSL or DDSL within 24 hours.
- If out of hours, contact the designated emergency safeguarding number.

## Sharing safeguarding information

Safeguarding information will be shared with other professionals or agencies on a strict need-to-know basis, including:

- SchoolsGroup team members and homestays;
- School DSLs;
- Social care services, safeguarding partners, and other appropriate agencies.

Staff and homestays are expected to maintain confidentiality in accordance with the organisation's Data Protection Policy. UK GDPR and the Data Protection Act 2018 do not prevent information being shared when it is necessary to protect a child.

Staff and homestays must never promise to keep safeguarding concerns secret.

The DSL/DDSL will determine who needs access to any safeguarding information and share it only with those who have a legitimate need.

Whenever possible, SchoolsGroup will seek consent from parents/carers before making a referral to social care—unless doing so places the child at increased risk or could jeopardise a police investigation.

# Role of the DSL and DDSL

The Designated Safeguarding Lead (DSL) holds primary responsibility for safeguarding and child protection, including online safety, within SchoolsGroup. This responsibility is clearly stated in their job description, and the DSL is granted the necessary authority and standing within the organisation to fulfil these duties effectively.

The Deputy Designated Safeguarding Lead (DDSL) is trained to the same standard as the DSL and acts in support and as cover in their absence. The expectations for the role are similarly outlined in their job description.

The DSL is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required.
- Support staff and homestays in making referrals to children's social care.
- Refer cases with radicalisation concerns to the Channel programme (this responsibility may also be held by the Prevent Lead, if different from the DSL).
- Support staff and homestays with referrals to the Channel programme, where needed.
- Refer cases to the police where a crime may have been committed.
- Act as a key point of contact with the three safeguarding partners.
- Liaise with the SchoolsGroup owner or managing director to keep them informed of safeguarding issues.
- Coordinate with staff and homestays on matters relating to safety, safeguarding, and digital wellbeing, and work with external agencies as appropriate.
- Serve as a source of expert advice and guidance for all staff and homestays.
- Promote effective information sharing both internally and with schools, safeguarding partners, agencies, and relevant professionals.
- Foster a culture of listening to students, ensuring their voices, concerns, and feelings are acknowledged and considered.
- Recognise the barriers students may face when approaching adults and take active steps to build trust and open communication.
- Ensure safeguarding policies are understood, implemented, and accessible to all relevant parties.
- Review and update the child protection policy annually and oversee regular reviews of safeguarding procedures in partnership with senior leadership.
- Ensure the child protection policy is available to stakeholders on the SchoolsGroup website.
- Engage with safeguarding partners to keep staff and homestays informed about training opportunities and updates to local safeguarding procedures.

## Contact Details For DSL and DDSL

| Role | Name | Contact Number | Email |
|---|---|---|---|
| Designated Safeguarding Lead (DSL) | Jessie Chang | 07356220011 | ukoffice@schoolsgroup.com |
| 24hr Emergency Contact Deputy Designated Safeguarding Lead (DDSL) | Nan Hu | 07809834932 | cbg@schoolsgroup.com |

## Prevent

SchoolsGroup has a dedicated Anti-Radicalisation and Prevent Policy that outlines procedures for identifying and responding to concerns about radicalisation. A copy of this policy is available upon request.

### Prevent Lead Contact Details

| | | |
|---|---|---|
| Jessie Chang | 07356 220011 | ukoffice@schoolsgroup.com |

# Record Keeping

SchoolsGroup is committed to maintaining clear, thorough, and accurate records for all safeguarding and child protection matters. These records are vital for ensuring a timely, coherent, and effective response to concerns and for providing an auditable trail of actions taken in relation to the welfare of a child.

All concerns, disclosures, decisions, and actions must be documented in writing, regardless of whether a referral is ultimately made. Records will be kept confidentially and securely, in a location separate from students' academic files. Hard copies will be stored in a locked filing cabinet, while digital records will be kept in a secure, encrypted, and access-controlled system. Only the DSL and DDSL will have authorised access to these safeguarding records.

Each safeguarding file must contain:

- A full and chronological account of all concerns raised, including dates, times, and individuals involved;
- A clear and comprehensive summary of the concern or disclosure, written in factual, objective language;
- Records of all discussions, including those with the student, parent/carer, or other professionals, noting who was present and the key points discussed;
- The rationale for any decisions made, including whether or not to refer to an external agency;
- A log of all actions taken, by whom, and when;
- Correspondence and documents exchanged with external agencies, including local safeguarding partners (LSP), police, or social care;
- Copies of referral forms, meeting minutes, and any plans or interventions agreed;
- Any follow-up actions and the outcomes of these, as well as closure information, if applicable.

Records will be dated, signed (or digitally verified), and updated in a timely manner. A separate safeguarding file will be created for each student where concerns exist, and a marker will be placed on the student's main file to indicate that a safeguarding file exists. Files will be retained in accordance with data retention and child protection regulations.

Information will only be shared on a strictly need-to-know basis to protect the student's welfare, in line with data protection legislation and SchoolsGroup's confidentiality and safeguarding policies. Where any staff member, homestay, or volunteer is unsure about recording procedures, they must consult the DSL or DDSL for guidance.

# Training and Updates

SchoolsGroup is committed to ensuring all staff, volunteers, and homestays receive appropriate safeguarding training based on their role. A record of all safeguarding training undertaken will be maintained.

### DSL and DDSL Training

The Designated Safeguarding Lead (DSL) and Deputy DSL must complete advanced safeguarding training delivered in person by a recognised provider, such as the Local Safeguarding Partners (LSP), AEGIS, or the NSPCC. This training must be renewed

at least every two years. Additional topical safeguarding updates will be attended as appropriate throughout the year.

### Staff Safeguarding Training

All other staff members, including administrative staff and volunteers, are required to complete Level 2 safeguarding training every two years. This training may be delivered online or face-to-face and must cover core principles of child protection, recognising signs of abuse, reporting procedures, and responding to disclosures..

### Homestay Host Training

All homestay hosts must complete safeguarding training annually. This will be based on the "Safeguarding for Homestay Hosts" course provided by the British Council or an equivalent approved course. The DSL will ensure hosts understand the specific responsibilities of their role, how to raise a concern, and SchoolsGroup's expectations in safeguarding matters.

In addition, SchoolsGroup encourages all staff and homestays to self-report situations where their actions may be misinterpreted or fall short of professional standards. A confidential system is in place for logging and escalating these incidents for review. These will be addressed promptly to uphold safeguarding standards.

## Whistleblowing

SchoolsGroup has a dedicated Whistleblowing Policy that outlines procedures for raising concerns about poor practice, misconduct, or potential breaches of the law by colleagues, managers, or others working within the organisation. This policy offers protection for individuals who report concerns in good faith and ensures that reports will be taken seriously, investigated appropriately, and that whistleblowers will not face retaliation.

## Local Safeguarding Partnerships (LSPs)

SchoolsGroup works in close collaboration with Local Safeguarding Partnerships (LSPs) and follows statutory guidance under *Working Together to Safeguard Children*. All partner schools have their own safeguarding policies, which include their designated LSP contacts and are available on their respective websites.

If a safeguarding concern arises while a student is placed in a homestay outside of their school's local authority area, SchoolsGroup will identify and liaise with the relevant local LSP for that region. The appropriate LSP's guidance and referral procedures will be followed.

The following link provides a central list of LSPs across the UK:

https://www.safecic.co.uk/your-scb-acpc/55-free-downloads-and-safeguarding-links/61-safeguarding-children-board-links

Local authority contact details for areas where SchoolsGroup operates will be listed in an appendix or safeguarding contact table. In cases where contact details are unclear or unavailable, staff will escalate concerns by calling the local police (101 for non-emergency or 999 in urgent cases). This applies across England, Wales, and Scotland.

In Scotland, non-emergency referrals can also be made to local children's social work teams via their local authority website, or to the Scottish Children's Reporter Administration:

https://www.scra.gov.uk/contact-us/

In Wales, contact should be made with the local child protection services through the appropriate local authority website. A summary of these will be included in the policy's reference section.

### Local LSP and LADO Contact Details

| Region | Local Safeguarding Partnership (LSP) / LADO Contact Information |
|---|---|
| Canterbury | Kent Safeguarding Children Multi-Agency Partnership (KSCMP) LADO: kentchildrenslado@kent.gov.uk Phone: 03000 410888 |
| Cambridge | Cambridgeshire & Peterborough Safeguarding Children Partnership LADO: LADO@cambridgeshire.gov.uk Phone: 01223 727967 |
| Birmingham | Birmingham Safeguarding Children Partnership LADO: lado@birminghamchildrenstrust.co.uk Phone: 0121 675 1669 |

## Liaison with Parents, Agents, and Partner Schools

- SchoolsGroup may need to share confidential safeguarding information with the Designated Safeguarding Lead (DSL) at the school or college a student attends. When a student transfers to a new institution, relevant safeguarding records may be shared with the DSL of the new school or college to support continuity of care and protection.
- While SchoolsGroup strives to maintain transparency and open communication with parents, the organisation retains the right to contact the

Local Safeguarding Partnership (LSP) or the police without informing parents, if it is judged to be in the best interest of the child.

- Safeguarding information will not normally be shared with agents unless it is necessary to protect a student. In such cases, information will be disclosed on a strict need-to-know basis and with the clear understanding that it must remain confidential.

# Further Detail on Specific Types of Abuse

The following guidance is adapted from *Keeping Children Safe in Education* and has been edited where appropriate to reflect the guardianship context. For additional detail, including other types of abuse, refer to Annex B of the latest edition of *Keeping Children Safe in Education*.

## Safeguarding Issues

Staff and homestays should be alert to behaviours that may indicate a student is at risk of harm. These may include substance misuse, missing education, involvement in serious violence (including county lines activity), radicalisation, and the consensual or non-consensual sharing of nudes or semi-nude images/videos. Key issues to be aware of include:

## Child Criminal Exploitation (CCE)

CCE involves individuals or gangs exploiting a power imbalance to coerce, manipulate, or deceive a child into criminal activity. This may be in exchange for goods, protection, status, or due to threats or violence. CCE can affect both boys and girls and often includes the movement of drugs or money (commonly referred to as 'county lines'), but may also involve other illegal activities such as theft, assault, or weapons carrying.

Victims may be coerced with threats or become indebted, creating cycles of entrapment. They may appear to act willingly, making the exploitation less obvious. Girls may experience different forms of coercion, and their vulnerability to both criminal and sexual exploitation should not be underestimated.

Further guidance on CCE can be found in Annex B of *Keeping Children Safe in Education*.

## Child Sexual Exploitation (CSE)

CSE is a form of sexual abuse where a child is coerced into sexual activities in exchange for attention, protection, money, or other benefits. It may involve physical sexual contact, but also includes non-contact forms such as grooming, the production or distribution of sexual images, and online abuse.

CSE may occur over time or be a single event. Some children may be unaware that they are being exploited, believing they are in a consensual relationship. CSE affects all genders and can include older children who may legally be able to consent to sex but are nevertheless being abused or manipulated.

Additional definitions, signs, and responses to CSE are outlined in Annex B of *Keeping Children Safe in Education*.

## Serious Violence

Indicators of involvement in or risk from serious violent crime include unexplained absences, changes in peer groups, new possessions, injuries, or signs of coercion. Risk factors include frequent absences, exclusion, prior victimisation, or early criminal behaviour. SchoolsGroup staff and homestays should consult *Preventing Youth Violence and Gang Involvement* and *County Lines Guidance* for further advice.

## Children Missing from Education

*"First Step to UK Independent Schools"*
www.schoolsgroup.com

BRITISH BOARDING
SCHOOLS NETWORK
Approved Agent
2024-2025

Repeated or prolonged absence can indicate multiple safeguarding risks including abuse, exploitation, or mental health crises. Staff must report such concerns to the student's school, which will follow its missing education protocol.

## County Lines

County lines refers to drug trafficking operations using children to transport and store drugs, often involving coercion and violence. Indicators include travel to unfamiliar areas, unexplained wealth, or possession of burner phones. Children may also be found in 'trap houses' or asked to conceal drugs internally. Further guidance is available via the Home Office.

## Modern Slavery and the National Referral Mechanism

Modern slavery involves human trafficking and forced exploitation. It includes sexual exploitation, forced labour, criminality, and organ removal. Staff should consult the *Modern Slavery Statutory Guidance* and refer any concerns via the National Referral Mechanism (NRM).

## Cybercrime

Cybercrime involves criminal activity using computers or networks. Examples include illegal hacking, denial-of-service attacks, or creation of malware. Some young people may unknowingly become involved. The DSL/DDSL may refer to the *Cyber Choices* programme where appropriate. More resources are available at the National Cyber Security Centre and NPCC.

# Mental Health

All SchoolsGroup staff and homestays must be aware that mental health difficulties may, in some cases, signal that a student has suffered or is at risk of suffering abuse, neglect, or exploitation.

While only trained professionals should make formal mental health diagnoses, staff and homestays are well-placed to observe students in their daily lives and to identify concerning behaviour. Recognising patterns of distress, withdrawal, or significant emotional changes is critical to early intervention.

Adverse childhood experiences, including abuse, neglect, or trauma, can significantly affect a child's mental health throughout their development. It is essential that all staff and homestays understand how these experiences may influence a student's behaviour, emotional wellbeing, and academic progress.

SchoolsGroup encourages staff and homestays to access guidance and professional support when identifying and responding to students with potential mental health concerns. Resources include:

- The AEGIS Quality Standards, which provide a Mental Health Support List (Appendix 10);
- The Department for Education's guidance on *Mental Health and Behaviour in Schools*;
- Public Health England's "Every Mind Matters" campaign, which includes lesson plans and wellbeing resources that may be useful for guardianship organisations.

If a mental health concern also raises safeguarding issues, staff and homestays must take immediate action. This includes following the Safeguarding and Child Protection Policy and informing the DSL or DDSL without delay.

There may be situations where SchoolsGroup is asked by a school to remove a student due to mental health concerns. In such instances, SchoolsGroup will liaise closely with the school to determine the most appropriate support plan for the student.

Before removing a student from a school setting for mental health reasons, the student's school will be asked to complete the *Student Removal Form* (see Appendix 2). This ensures the organisation has a clear understanding of the background and rationale for the request, enabling SchoolsGroup to provide appropriate care and follow-up support for the student.

## Sexual Violence and Sexual Harassment Between Children

Sexual violence and sexual harassment can occur between children of any age or gender, both in person and online. It may also involve groups of children targeting individuals or other groups. These incidents can be profoundly distressing and may affect a student's emotional wellbeing, school experience, and academic progress, particularly when the alleged perpetrator is part of the same school environment.

Such behaviour is never acceptable. Staff and homestays must ensure that students reporting these experiences are taken seriously, supported appropriately, and never made to feel ashamed or at fault. Sexual violence and harassment exist on a continuum and may overlap. Staff and homestays must be vigilant in identifying and responding to all incidents.

Certain student groups may be more vulnerable, including girls, children with SEND, and LGBTQ+ children.

Staff and homestays must:

- Challenge inappropriate sexual behaviours and language;
- Make clear that such behaviours are not tolerated;
- Never dismiss behaviour as "banter" or "part of growing up"; and
- Intervene in physical acts such as touching or lifting clothing that may be sexually motivated.

### What is Sexual Violence?

Sexual violence refers to offences under the Sexual Offences Act 2003, including:

- Rape – Non-consensual penetration with a penis.
- Assault by Penetration – Non-consensual penetration with any object or part of the body.
- Sexual Assault – Non-consensual sexual touching.
- Causing someone to engage in sexual activity without consent – Including coercing a child into sexual acts with another person or alone.

Consent means having the freedom and capacity to choose. A child under 13 cannot legally consent to any sexual activity. The age of consent is 16.

### What is Sexual Harassment?

Sexual harassment is unwanted conduct of a sexual nature that violates dignity or creates a hostile, degrading, or sexualised environment. It can occur online or offline and may involve:

- Sexual comments, jokes, or name-calling
- Inappropriate touching or display of sexual images
- Online behaviour such as sending explicit content, sexting, or upskirting (a criminal offence)

### Responding to Reports

The response to any disclosure must be immediate, supportive, and non-judgmental. Staff and homestays must follow the reporting process as outlined in *Keeping Children Safe in Education* (KCSIE), Part One, and consult the DSL or DDSL without delay.

## So-Called 'Honour'-Based Abuse

So-called 'honour'-based abuse (HBA) includes crimes and incidents committed to protect or defend the perceived honour of the family or community. This includes female genital mutilation (FGM), forced marriage, breast ironing, and other harmful practices. These acts often involve collective family or community pressure and can include multiple perpetrators.

All forms of HBA are considered abuse and must be treated as such. Staff and homestays must recognise the complexity and risks involved and respond in accordance with safeguarding protocols. If there is any concern that a child may be at risk or has been a victim of HBA, staff or homestays must immediately report this to the DSL or DDSL. The safeguarding lead will follow national and local procedures and liaise with police and children's social care as appropriate.

### Female Genital Mutilation (FGM)

FGM refers to any procedure involving the partial or total removal of external female genitalia or other injury to female genital organs for non-medical reasons. It is illegal in the UK and a severe form of abuse.

All staff and homestays must report concerns about FGM to the DSL or DDSL. Teachers have a specific legal duty to report to the police if they discover that an act of FGM appears to have been carried out on a girl under 18.

### Forced Marriage

A forced marriage occurs when one or both individuals do not freely consent and pressure, threats, or coercion are involved. It is a criminal offence in England and Wales. Guardianship staff may become aware of warning signs and must act swiftly. The Forced Marriage Unit offers support and can be contacted on 020 7008 0151 or via fmu@fcdo.gov.uk.

## Domestic Abuse

Under the Domestic Abuse Act 2021, children who witness or experience the effects of domestic abuse are recognised as victims in their own right. Abuse can take the form of physical, emotional, sexual, economic, or coercive and controlling behaviours. It can happen between current or former partners or between family members.

Children may experience or witness domestic abuse either at home or in homestays. This may include teenage relationship abuse or abuse directed at parents. SchoolsGroup recognises the wide-reaching and lasting impact that domestic abuse can have on children's emotional wellbeing and development. Safeguarding procedures must be followed in all such cases.

## Online Safety

Safeguarding students from online risks is a core priority. Risks are classified into four areas:

1. **Content** – Exposure to harmful or inappropriate content (e.g., pornography, fake news, racism, self-harm, suicide, extremist views).
2. **Contact** – Harmful online interactions (e.g., grooming, exploitation, peer pressure, impersonation).
3. **Conduct** – Risky or harmful online behaviour (e.g., sexting, cyberbullying, sharing explicit content).
4. **Commerce** – Financial risks (e.g., phishing, gambling, online scams).

If there is concern that a student or staff member has been affected by an online commercial scam or phishing attempt, SchoolsGroup will report this to the Anti-Phishing Working Group (https://apwg.org/).

Further detail is outlined in SchoolsGroup's Online Safety and Bullying Policies. Regular online safety training is provided to all staff, homestays, and volunteers to promote awareness and prevention.

## REVIEW

We are committed to reviewing our policy and good practice annually.
This policy was last reviewed on: 6TH April 2025
Signed: Jessie Chang

# APPENDIX 1 : INCIDENT FORM

## CHILD PROTECTION RECORD – Report of a Concern

| | | | |
|---|---|---|---|
| **Date of record:** | | **Date of incident:** | |
| **Name of referrer:** | | **Role of referrer:** | |
| **Student name:** | | | |
| **Details of concern:** | *use initials for other children / young people involved, unless there is a specific need to name them in full*<br>*contemporaneous notes, if taken, may be attached to this form* | | |
| **Reported to:** | | **Role of person reported to:** | |
| **Signed:** | | | |

**For DSL/DDSL use**

| | |
|---|---|
| **Action taken:** | |
| **Advice sought:** | *from whom and what was advice given* |
| **Concern / referral discussed with parent?** | *If not, state reasons why – if yes, note discussion with parent/carer* |
| **Referral made?** | *If not, state reasons why – if yes, record to whom and any action agreed* |
| **Feedback to referring member of staff or homestay:** | |
| **By whom** | |
| **Response to / action taken with student:** | |
| **By whom** | |
| **Name and contact of key workers:** | |
| **Name and contact details of GP:** | |
| **Other notes / information / concerns:** | |
| **Any other action required:** | |

## APPENDIX 2 : STUDENT REMOVAL FORM

In order for us to support our student as best as possible, we would appreciate it if you could complete the following student removal form. Please note that a representative of SchoolsGroup Education will not be able to collect the student until this form has been completed and returned to us by email: ukoffice@schoolsgroup.com

| | |
|---|---|
| **School Name** | |
| **Student Name** | |
| **Date of Birth** | |
| **Reason for request of removal** | |
| **Has the student been assessed by a medical professional?** | ☐ Yes, date of assessment:  No ☐ |
| **Please provide a summary of assessment if applicable.** | |
| **Is the student at risk of harm to themself?** | Yes ☐  No ☐ |
| **Is the student a risk to others?** | Yes ☐  No ☐ |
| **Has the school followed its mental health and child protection policies and procedures?** | Yes ☐  No ☐ **Please provide a copy of any relevant policies and procedures.** |
| **Any other additional information we should be made aware of** | |
| **Name** | |
| **Position** | |
| **Date** | |