

Safeguarding Children & Child Protection Policy

British
Guardianship



Safeguarding Children & Child Protection Policy

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Safeguarding Children & Child Protection Policy

1. British Guardianship Safeguarding Introduction

This Safeguarding and Child Protection Policy includes the organisation's Staff and Homestay Code of Conduct, which all staff, volunteers, local coordinators and homestays are required to read, understand and adhere to.

- British Guardianship makes sure that the staff, schools and host families become fully aware of their responsibility to safeguard and promote the welfare of children.
- Children and young people are listened to, valued and respected.
- Staff are aware of the need to be alert to the signs of abuse and know what to do with their concerns.
- All staff are subject to rigorous recruitment procedures.
- All staff are given appropriate support and training.
- Policies will be reviewed annually, unless an incident or new legislation or guidance suggests the need for an earlier date of review.
- Policy statement is linked to the Child Protection Policy.

British Guardianship recognises its responsibility to safeguard and promote the welfare of children within the legal framework of the Children Acts 1989 and 2004. We are aware that many children and young people are the victims of different kinds of abuse and that they can be subjected to social factors that have an adverse impact upon their lives. We aim to create a safe environment within which children and young people can thrive and adults can work with the security of clear guidance. The document specifics safeguarding, Safer Recruitment, safe use of the internet and Behaviour conduct.

The procedures contained in this policy apply to all staff, host families, students and their families and are consistent with those of Child Protection Policy guided by an operate in line with Keeping Children Safe in Education (KCSIE 2024). British Guardianship refers to various expert sources advice on child abuse and safeguarding, for example National Society for the Prevention of Cruelty to Children (NSPCC) website and the Local Safeguarding Partnership (LSP) when developing policies and managing incidents.

Policy owner:	Director of Safeguarding and Operations
Date introduced:	May 2016
Related documents:	Child Protection Policy

Supporting Safeguarding Policies and Procedures

This Safeguarding and Child Protection Policy should be read in conjunction with the following supporting policies and procedures, which together form part of British Guardianship's safeguarding framework:

Safeguarding Policies

(all available at the following link: <https://www.britishguardianship.com/our-policies/>)

- Anti-Bullying and Cyberbullying Policy
- Anti-Radicalisation & Prevent Duty Policy
- Emergency Plan
- Mental Health Policy
- Missing and Absent Student Policy
- Online Safety Policy
- Photography Use Policy

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- Safer Recruitment Policy
- Welfare Health & Safety Policy
- Whistleblowing Policy

General Policies

(all available at the following link: <https://www.britishguardianship.com/our-policies/>)

- Data Protection
- Privacy Policy
- Complaints Policy

Student, Parent, Staff & Host Family Documents

- Student Code of Conduct (available at the following link: <https://www.britishguardianship.com/download/student-code-of-conduct.pdf>)
- Staff and Homestay Code of Conduct (available at the following link: <https://www.britishguardianship.com/download/staff-and-homestay-code-of-conduct.pdf>)
- Parents Handbook (available at the following link: <https://www.britishguardianship.com/download/handbook-parents.pdf>)
- Student Handbook (available at the following link: <https://www.britishguardianship.com/download/handbook-students.pdf>)
- Host Family Handbook (available at the following link: <https://www.britishguardianship.com/download/homestay-handbook.pdf>)
- Homestay Standards (available at the following link: <https://www.britishguardianship.com/download/homestay-standards.pdf>)
- Job Description for Staff & Homestay (available at the following link: <https://www.britishguardianship.com/download/job-description.pdf>)

All Safeguarding policies are available to staff, host families, students and parents via the British Guardianship website and internal document systems. Copies can also be provided upon request.

The Designated Safeguarding Lead is responsible for ensuring that these policies are kept up to date and implemented effectively.

2. Principles And Aims

Principles

- British Guardianship will ensure that the welfare of children is given paramount consideration in all aspects of their lives whilst they are here in the UK.
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm in accordance with this guidance.
- All staff involved in child protection issues will receive appropriate support from the Designated Safeguarding Lead

Aims

- To provide all staff with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children.
- To ensure consistent good practice across the staff, schools, families, students and homestays.
- To demonstrate the company's commitment with regard to safeguarding children.
- Ensure that all British Guardianship staff have a valid Enhanced DBS certificate and understand

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their role and responsibility in respect of identifying safeguarding opportunities and reporting child protection concern.

- Create a culture of safe recruitment and adopt procedures that help identify people who might abuse children and also children at risk of abuse.

3. Terminology

"Safeguarding" is the protection of children from maltreatment, preventing the impairment of children's health/development and ensuring that children grow up in circumstances consistent with the provision of safe and effective care. Working together to safeguard children (HM Government 2018)

"Child Protection" is a part of safeguarding and promoting welfare to protect specific children, who are suffering or are at risk of suffering significant harm.

Staff refers to all those working for or on behalf of the British Guardianship Organisation, full time or part time, in either a paid or voluntary capacity.

Child, Student refers to all young people who have not yet reached their 18th birthday.

Parent refers to birth parents and other adults who are in a parenting role, for example step-parents or adoptive parents.

4. Context

Research suggests that more than 10 per cent of children will suffer some form of abuse. Due to their day-to-day contact with children, staff, families and school staff are uniquely placed to observe changes in children's behaviour and to recognise the outward signs of abuse. Children may also turn to their guardian or a trusted adult in their school or host families when they are in distress or at risk. It is vital that every staff is alert to the signs of neglect and abuse and understand the local procedures for reporting and acting upon their concerns.

British Guardianship recognises '**Safeguarding**' as a standard and practical procedure for protecting children who are at risk of any kinds of abuse. We strongly believe that operational safeguarding will prevent or at least decrease future possible harms to the children. We have indicated below the 4 different types of abuse:

Recognising abuse

It can often be difficult to recognise abuse. The signs listed in these guidelines are only indicators and many can have reasonable explanations. Children may behave strangely or seem unhappy for many reasons, as they move through the stages of childhood or their families experience changes. It is nevertheless important to know what could indicate that abuse is taking place and to be alert to the need to consult further.

Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.

An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. It often happens over a period of time, rather than being a one-off event. And it can increasingly happen online. www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/

If you are worried about a child it is important that you keep a written record of any physical or behavioural signs and symptoms. In this way you can monitor whether or not a pattern emerges and provide evidence to any investigation if required.

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1. Physical Abuse

A form of abuse which 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.

2. Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It 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. It may include 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 feature age or developmentally inappropriate expectations being imposed on children. These 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. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

3. 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 non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

4. Child sexual exploitation

Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.

Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online.

Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

- Female genital mutilation (FGM)

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting.

Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence.

There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

5. Neglect

The persistent failure to meet a child's basic physical and/or psychological needs, likely to

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result in the serious impairment of the child's health or development. 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

6. Domestic abuse

Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. But it isn't just physical violence – domestic abuse includes emotional, physical, sexual, financial or psychological abuse.

Abusive behaviour can occur in any relationship. It can continue even after the relationship has ended. Both men and women can be abused or abusers.

Domestic abuse can seriously harm children and young people. Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships.

Child-on-Child Abuse (Peer-on-Peer Abuse)

British Guardianship recognises that children can abuse other children. This is referred to as child-on-child abuse or peer-on-peer abuse and is taken as seriously as abuse perpetrated by adults.

Child-on-child abuse may include, but is not limited to:

- Bullying, including cyberbullying
- Physical abuse such as hitting, kicking, shaking or other forms of violence
- Sexual violence and sexual harassment
- Harmful sexual behaviour
- Emotional abuse or coercion
- Initiation or hazing-type behaviours

We recognise that such abuse can occur both inside and outside of school and online.

How British Guardianship Responds:

All allegations or concerns relating to child-on-child abuse are taken seriously and responded to promptly in line with this Safeguarding and Child Protection Policy.

The Designated Safeguarding Lead (DSL) will:

- Ensure the immediate safety and wellbeing of all students involved
- Take all concerns seriously and record them clearly and accurately
- Carry out an initial risk assessment of the situation
- Work in partnership with the student's school, parents, and relevant external agencies where appropriate
- Consider the impact on the victim, providing appropriate support and reassurance
- Consider the needs and risks posed by the alleged perpetrator and take appropriate action
- Ensure that sexual violence and sexual harassment are recognised as serious safeguarding concerns and are responded to appropriately

Where necessary, referrals will be made to children's social care, the police, or other statutory services.

British Guardianship ensures that all responses are:

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- Proportionate
- Child-centred
- Focused on safeguarding all children involved

Indicators of abuse and what you might see

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the **Designated Safeguarding Lead**.

A child who is being abused and/or neglected may:

- Have bruises, bleeding, burns, fractures or other injuries.
- Show signs of pain or discomfort.
- Keep arms and legs covered, even in warm weather.
- Be concerned about changing for PE or swimming.
- Look unkempt and uncared for.
- Change their eating habits.
- Have difficulty in making or sustaining friendships.
- Appear fearful.
- Be reckless with regard to their own or other's safety.
- Self-harm.
- Show signs of not wanting to go home.
- Display a change in behaviour - from quiet to aggressive, or happy-go-lucky to withdrawn.
- Challenge authority.
- Become disinterested in their school work.
- Be constantly tired or preoccupied.
- Be wary of physical contact.
- Be involved in, or particularly knowledgeable about drugs or alcohol.
- Display sexual knowledge or behaviour beyond that normally expected for their age.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the Designated Safeguarding Lead to decide how to proceed. It is very important that you report your concerns – you do not need 'absolute proof' that the child is at risk.

The impact of abuse

The impact of child abuse should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach, and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

Taking action

British Guardianship asks all staff to consider these key points for taking action:

- In an emergency, report your concern to the Designated Safeguarding Lead or the deputy.
- If none of the above were immediately contactable, take the action necessary to help the child, for example, call 999.

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- If the Designated Safeguarding Lead is not around, ensure the information is shared with the deputy that day and ensure action is taken to report the concern to children's social care.
- Do not your own investigation.
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.
- Complete a record of concern (See Appendix 1).
- Seek support for yourself if you are distressed.
- In emergency situations, staff, host families and students must follow the British Guardianship Emergency Procedure, which sets out the required actions and escalation steps. This procedure is available at the following link: [<https://britishguardianship.com/download/emergency-plan.pdf>] and must be followed alongside this Safeguarding and Child Protection Policy

If a child discloses information to you

It takes a lot of courage for a child to disclose that they are being neglected and or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen, if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

During your conversation with the child

- Allow them to speak freely.
- Remain calm and do not over react – the child may stop talking if they feel they are upsetting you.
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'.
- Do not be afraid of silences – remember how hard this must be for the child.
- Under no circumstances ask investigative questions – such as how many times this has happened, whether it happens to siblings too, or what does the child's mother think about all this.
- At an appropriate time tell the child that in order to help them you must pass the information on.
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused.
- Avoid admonishing the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but the child may interpret it that they have done something wrong.
- Tell the child what will happen next. The child may agree to go with you to see the designated person. Otherwise let them know that someone will come to see them before the end of the day.
- Report verbally to the designated person.
- Write up your conversation as soon as possible on the record of concern form and hand it to the designated person.
- Seek support if you feel distressed.

Notifying parents

The child's educational guardian will be the main point of contact with the parents and will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively and the Designated Safeguarding Lead will make contact first with the school to find out if there has been any relevant action taken by them and then with the parent in the event of a concern, suspicion or disclosure. However, if we believe that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from children's

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social care.

Referral to children's social care

The Designated Safeguarding Lead will make a referral to children's social care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the Designated Safeguarding Lead or her deputy. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Record of concern forms and other written information will be stored electronically and the electronic information will be password protected and only made available to relevant individuals. Child protection information will be stored separately from the child's Individual and academic file and kept in a separate private folder.

The Data Protection Act does not prevent the company's staff from sharing information with relevant agencies, where that information may help to protect a child.

Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- The situation is an emergency and the Designated Safeguarding Lead, their deputy and the Guardianship Director & Client Relations are all unavailable.
- They are convinced that a direct report is the only way to ensure the child's safety.

Whistleblowing policy

British Guardianship is committed to fostering a culture of trust, openness, and accountability among its staff. We encourage honest and appropriate feedback on all aspects of our operations to ensure the highest standards of conduct. This policy outlines the procedures for reporting concerns and protecting whistleblowers.

Whistleblowing refers to raising concerns about suspected wrongdoing or dangers in connection with our organisation. Under certain circumstances, employees are legally protected from suffering any detriment or dismissal if they make disclosures about the organisation.

This policy is designed to comply with the **Public Interest Disclosure Act 1998 (PIDA)** and aligns with safeguarding obligations under **Working Together to Safeguard Children (2023)** and related legislation.

Purpose

This policy aims to:

- Provide a safe and confidential process for staff to raise concerns about suspected wrongdoing or dangers.
- Ensure all concerns, particularly those relating to safeguarding, are addressed effectively.
- Protect whistleblowers from retaliation or victimisation.
- Promote compliance with UK legislation and safeguarding standards.

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Scope

This policy applies to all employees, volunteers, contractors of British Guardianship and host families who provide care for children under the company's guardianship. It covers concerns that are:

- In the public interest.
- Likely to result in one or more of the following "qualifying disclosures":
- A criminal offence.
- A failure to comply with a legal obligation.
- A miscarriage of justice.
- Endangering the health and safety of an individual.
- Environmental damage.
- Deliberate concealment of any of the above.

Concerns relating to safeguarding children or young people are always treated as a priority.

Reporting procedure for employees, volunteers and contractors

1. Internal Reporting (Non-Safeguarding Matters)

If you have a concern relating to employment, conduct, finance, HR or other non-safeguarding matters, you are encouraged to report it in writing to: **Almu Vilchez, Finance and HR Director**, almu@britishguardianship.com

We encourage openness and all such concerns will be treated with the utmost confidentiality.

Safeguarding concerns, allegations, or low-level concerns relating to the welfare of a child must be reported directly to the Designated Safeguarding Lead (DSL) or Deputy DSL in accordance with the Safeguarding and Child Protection Policy.

2. External Reporting

If internal reporting is inappropriate or unsatisfactory, you may contact:

- **NSPCC Whistleblowing Helpline: 0800 028 0285** or help@nspcc.org.uk
 - **Protect** for independent advice: **020 3117 2520** or www.protect-advice.org.uk.
 - **Brighton and Hove Local Authority Designated Officer: LADO: +44(0)1273 295 643**
- Contact details for other local authorities can be provided by British Guardianship or the local authority safeguarding team.

3. Alternative Formal Representation (External Oversight)

If you feel unable to raise a matter internally, or you believe your concern has not been addressed appropriately after following the procedures above, you may make a formal representation to:

• **AEGIS – The Association for the Education & Guardianship of International Students**

Email: info@aegisuk.net

Tel: **+44 (0)1453 821293**

Address: The Wheelhouse, Bond's Mill Estate, Bristol Road, Stonehouse, Gloucestershire GL10 3RF

• **Boarding Schools' Association (BSA)**, c/o International & Membership Director

Email: bsa@boarding.org.uk

4. Anonymous Reporting

You may report concerns anonymously. While anonymity may limit our ability to investigate, we will assess the concern based on its seriousness and credibility.

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Reporting procedure for host families

Host families who have concerns about:

- The safety or welfare of a child in their care.
- The conduct of British Guardianship staff, volunteers, or other host families.
- Any suspected wrongdoing (e.g., breaches of safeguarding practices, health and safety concerns, or illegal activities).

Should report their concerns promptly through one of the following channels:

1. Internal Reporting (Non-Safeguarding Matters)

Concerns relating to employment, finance, HR, contractual or other non-safeguarding matters may be reported in writing to:

Almu Vilchez, Finance and HR Director, almu@britishguardianship.com

All such concerns will be treated with the utmost confidentiality.

Safeguarding concerns, child protection matters, allegations or low-level concerns relating to the welfare of a child must be reported directly to the Designated Safeguarding Lead (DSL) or Deputy DSL, in accordance with the Safeguarding and Child Protection Policy.

2. External Reporting

If the concern relates to child protection or safeguarding and you feel internal reporting is not appropriate, you may contact:

- **NSPCC Whistleblowing Helpline: 0800 028 0285 or help@nspcc.org.uk**
- **Protect** for independent advice: **020 3117 2520** or **www.protect-advice.org.uk**
- **Brighton and Hove Local Authority Designated Officer: LADO: +44(0)1273 295 643**

Contact details for other local authorities can be provided by British Guardianship or the local authority safeguarding team.

3. Emergencies

If you believe a child is in immediate danger, contact the **police** (999) or **Children's Social Services** directly.

Whistleblowing and safeguarding child protection

Safeguarding is central to our organisation's purpose. Any concerns about the safety or welfare of a child must be reported immediately. This includes:

- Concerns about a colleague's behaviour toward children.
- Low-level concerns, where behaviour does not meet the safeguarding threshold but is still inappropriate.

Safeguarding disclosures must be handled in line with our **Safeguarding and Child Protection Policy**. Where necessary, concerns will be referred to:

- The Local Authority Designated Officer (LADO).
- Social services.
- The police.

Safeguarding concerns from host families

Host families are an integral part of safeguarding and should report:

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- Concerns about a child's welfare (e.g., neglect, abuse, or emotional distress).
- Concerns about inappropriate conduct by British Guardianship staff, other host families, or other parties involved with the child.

All safeguarding concerns will be handled in line with the company's **Safeguarding and Child Protection Policy** and referred to the appropriate authorities when necessary.

Low-level concerns

Low-level concerns involve behaviour that is inappropriate but does not meet the threshold for a safeguarding referral. Examples include:

- Minor breaches of the organisation's Code of Conduct.
- Unintentional contraventions of safeguarding practices.

Low-level concerns should be reported to the **Guardianship Director & Client Relations, Tannaz Fatoorehchi (tannaz@britishguardianship.com)** who will review the evidence, address the concern with the individual involved, and determine appropriate actions (e.g., training, monitoring). Repeated or escalated concerns will lead to formal action.

Protection and support for whistleblowers

British Guardianship is committed to protecting whistleblowers. Any staff member raising a genuine concern will not suffer harassment, victimisation, or detrimental treatment as a result. This protection applies even if the concern is unfounded, provided it was raised in good faith.

- **Detrimental Treatment:** Bullying, harassment, or dismissal of whistleblowers is prohibited. Anyone engaging in such behaviour will face disciplinary action.
- **Malicious Allegations:** Deliberately false or malicious allegations will be treated as a disciplinary matter.

Protection and support for host families

Host families will receive:

- **Training and Information:** British Guardianship will provide whistleblowing and safeguarding training to all host families during their induction and at regular intervals.
- **Assurance of Confidentiality:** Any concerns raised will be treated in confidence, and the identity of the whistleblower will be protected wherever possible.
- **Protection Against Repercussions:** Host families will be protected from harassment or victimisation for raising concerns in good faith.

Confidentiality

All disclosures will be treated in confidence, and every effort will be made to protect the identity of whistleblowers. However, absolute confidentiality cannot be guaranteed if legal obligations require disclosure (e.g., court proceedings).

Training and awareness

To ensure staff understand their rights and responsibilities:

- Whistleblowing procedures will be included in staff induction training.
- Regular refresher training and awareness campaigns will be conducted.
- The policy will be accessible to all staff, including alternative formats for those with additional needs.

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Monitoring and review

This policy will be reviewed annually to ensure it remains effective and compliant with changes in legislation and best practices. Staff feedback on the policy is encouraged and will be considered during the review process.

The company will ensure this policy and its whistleblowing procedures are accessible and regularly communicated to all host families.

Last Reviewed: 28/01/2026

Next Review Due: 28/01/2027

Contact information at a glance

Contact	Role	Contact Details
Almu Vilchez	Finance and HR Director	almu@britishguardianship.com
Tannaz Fatoorehchi	Guardianship Director and Client Relations	tannaz@britishguardianship.com
Poliane Costa	Manager and Designated Safeguarding Lead	polly@britishguardianship.com
David Walker	Executive Director, BSA	bsa@boarding.org.uk
AEGIS	The Association for the Education & Guardianship of International Students	+44(0)1453 821293 info@aegisuk.net
NSPCC Whistleblowing Line	External Child Protection Support	0800 028 0285 help@nspcc.org.uk
Protect	Independent Advice	020 3117 2520 www.protect-advice.org.uk

5. Key Personnel in British Guardianship Organisation

The Manager and Designated Safeguarding Lead in British Guardianship is: **Mrs. Poliane Costa**
Office Telephone: **+44 (0) 1273 764 716** / Mobile, Whatsapp: **+44(0) 7841 611 284**
Email: **polly@britishguardianship.com**

The deputy designated person in British Guardianship is: **Mrs. Tannaz Fatoorehchi**
Office Number: **+44 (0) 1273 72 55 77** / WhatsApp only: **+447935646492**
Email: **tannaz@britishguardianship.com**

6. Roles And Responsibilities

British Guardianship has a **Designated Safeguarding Lead** to coordinate child protection arrangements and this person is named in this policy guidance.

British Guardianship organisation has ensured that the Designated Safeguarding Lead:

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- Is appropriately trained.
- Acts as a source of support and expertise to all the staff.
- Has an understanding of British Guardianship procedures.
- Ensures that the safeguarding and child protection policy and procedures are implemented and followed by all staff.
- Allocates sufficient time and resources to enable both herself and deputy to carry out their roles effectively.
- Ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the company's whistle blowing procedures.
- Ensures that child's safety and welfare is addressed through the curriculum.
- Keeps written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child's general file.
- Refers cases of suspected neglect and/or abuse to children's social care or police in accordance with this guidance and local procedure..
- Keep constant contact with the school to find out if a child has been absent/missing from the school and notifies children's social care if a child with a child protection plan is absent for more than two days without explanation.
- Attends and/or contributes to child protection conferences in accordance with local procedure and guidance.
- Coordinates the company's contribution to child protection plans .
- Ensures that all staff sign to indicate that they have read and understood this policy.
- Ensures that the child protection policy is updated annually.
- Keeps a record of staff attendance at child protection training.
- Makes this policy available to parents, students and host families.

British Guardianship's Designated Safeguarding Lead has put in place:

- Safer recruitment procedures that include the requirement for appropriate checks in line with national guidance.
- A training strategy that ensures all staff, including the host families receive child protection training, with refresher training on an annual basis.
- Arrangements to ensure that all temporary staff and volunteers are made aware of the company's arrangements for child protection.

In addition, the **deputy designated person** is appropriately trained and, in the absence of the designated person, carries out those functions necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the designated person, the deputy will assume all of the functions above.

7. Good Practice Guidelines

To meet and maintain our responsibilities towards children, British Guardianship agrees to the following standards of good practice:

- Treating all children with respect.
- Setting a good example by conducting ourselves appropriately.
- Involving children in decision-making which affects them.
- Encouraging positive and safe behaviour among children.
- Being a good listener.
- Being alert to changes in child's behaviour.
- Recognising that challenging behaviour may be an indicator of abuse.
- Reading and understanding all of the company's safeguarding and guidance documents on wider safeguarding issues, for example physical contact, e-safety plans and information-sharing.
- Maintaining appropriate standards of conversation and interaction with and between children and staff and avoiding the use of sexualised or derogatory language.

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- Being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and or abuse.
- Forbidding all employees from using corporal restraint against any student

8. Abuse of Trust

All British Guardianship staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach.

In addition, staff should understand that, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the host family or staff and a child under 18 may be a criminal offence, even if that child is over the age of consent.

9. Children Who May Be Particularly Vulnerable

Some children may be at increased risk of neglect and or abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

To ensure that all of our children receive equal protection, we will give special consideration and attention to children who are:

- Disabled or have special educational needs.
- Vulnerable to being bullied, or engaging in bullying.
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality.

10. Support For Those Involved In A Child Protection Issue

Child neglect and abuse is devastating for the child and can also result in distress and anxiety for staff who become involved. We will support the children and their families and staff by:

- Taking all suspicions and disclosures seriously.
- Responding sympathetically to any request from a child or member of staff for time out to deal with distress or anxiety.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- Storing records securely.
- Offering details of help lines, counselling or other avenues of external support.
- Following the procedures laid down in our whistle blowing, complaints and disciplinary procedures.

11. Complaints Procedure In Respect Of Poor Practice Behaviour

Our complaints procedure will be followed where a child, parent or host family raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action. Poor practice examples include unfairly singling out a child, using sarcasm or humiliation as a form of control, bullying or belittling a child or discriminating against them in some way. Complaints are managed by the Guardianship Director & Client Relations, senior staff and the Designated Safeguarding Lead.

Complaints from staff are dealt with under the company's complaints and disciplinary and grievance procedures. Should you need to make a complaint, please ask the Designated Safeguarding Lead for the relevant form.

Complaints procedure

You can make your complaint by phone, by e-mail or in writing. We have a two stage complaint procedure. We will always try to deal with your complaint quickly. But if it is clear that the

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matter will need a detailed investigation, we will tell you and keep you updated on our progress.

Stage 1 - frontline resolution

Please contact a member staff on our 24/7 emergency line. We will always try to resolve your complaint quickly, within 5 working days, if we can. If you are dissatisfied with our response, you can ask us to consider your complaint at stage 2.

Stage 2 - investigation

Our company's Guardianship Director & Client Relations will look at your complaint at this stage if you are dissatisfied with our response at stage 1. We also look at some complaints immediately at this stage, if it is clear that they are complex or need detailed investigation. We will acknowledge your complaint within 48 hours. We will give you our decision as soon as possible. This will be after no more than 5 working days unless there is clearly a good reason for needing more time.

12. If You Have Concerns About A Colleague

Staff who are concerned about the conduct of a colleague (i.e. a guardian) towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. All concerns of poor practice or concerns about a child's welfare brought about by the behaviour of colleagues should be reported to the Designated Safeguarding Lead.

13. Staff, Homestay Members Who Are The Subject Of An Allegation

When an allegation is made against a member of staff or host family, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events can and do happen. A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some adults do pose a serious risk to children's welfare and safety and we must act on every allegation made. Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Allegations against staff should be reported to the Designated Safeguarding Lead:

Mrs. Poliane Costa

Office Telephone: **+44 (0) 1273 764 716** / Mobile, Whatsapp: **+44(0) 7841 611 284**

Email: polly@britishguardianship.com

14. Staff Training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. New staff will receive training during their induction. All staff, including the office staff, local coordinators and homestays will receive training that is updated every year.

15. Safe Caring Plan

At British Guardianship, we are dedicated to safeguarding and promoting the welfare of children and vulnerable adults. We believe that everyone has a responsibility to look after children and young people and that children and young people have rights as individuals and should be treated with respect. We will do our utmost to ensure that a safe homestay environment is provided for any young person, and we expect all staff members and homestay hosts to share this dedication.

Objective

- It is our duty to ensure that all students under the age of 18 should feel safe, and are protected from any form of potential abuse from all adults including homestay hosts and homestay visitors.

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- We endeavour to inform our homestay hosts and staff members of their responsibilities in the event that they are in regular, significant or occasional contact with children or young adults.
- We are committed to practising safe recruitment including careful selection and vetting of staff members, homestay hosts and other suppliers.

British Guardianship homestay accommodation

At British Guardianship, we are committed to the following:

- To ensure that all homestay hosts are aware of their duty of care to guests under the age of 18.
- To visit and vet all applicants before accepting them as hosts.
- To ensure that all hosts intending to accommodate guests under the age of 18 have an Enhanced Disclosure and Barring Service (DBS, formerly CRB) check undertaken by British Guardianship organisation.
- To annually review homestay profiles to make certain that circumstances have not changed.
- To ensure that all under-18s and their hosts follow the applicable curfew time of 10.00pm. For under-16s the curfew time is 9.00pm unless otherwise stated by their school.
- To remove unsuitable homestay hosts from our register.
- To ensure that we receive consent from parents for activities that are unsupervised activities or fall outside the agreed curfew time.
- To offer only a full board meal plan to under-18s.
- To offer a pick-up and drop-off service to and from a central meeting point for our underage students (at an extra cost).

16. Safer Recruitment

Our Company endeavours to ensure that we do our utmost to employ 'safe' staff by following the guidance in Safeguarding Children and Safer Recruitment in Education. Key elements within British Guardianship's safer recruitment process include:

- Using our website to advertise necessary roles.
- Making sure that all advertisements including the ones for new office staff and host families are reviewed by our Designated Safeguarding Lead and are compliance with the Safer Recruitment guidance.
- Obtaining a complete application form from applicants.
- Ensuring the job description for all posts/roles makes reference to the responsibility for safeguarding and promoting the welfare of children.
- Ensuring that the person specification for all posts/roles includes specific reference to suitability to work with children.
- Obtaining and scrutinising comprehensive information from applicants, and taking up and satisfactorily resolving any gaps, discrepancies or anomalies.
- Obtaining two referees' contact details, including at least one who can comment on the applicant's suitability to work with children.
- A face-to-face interview that explores the candidate's suitability to work with children as well as his or her suitability for the post.
- Verifying the successful applicant's identity.
- Verifying that they have the Right to Work in the UK.
- Verifying the successful applicant's qualifications.
- Checking his or her previous employment history and experience.
- Carrying out an Enhanced Disclosure and Barring (DBS) Check for all British Guardianship applicants.
- Doing all the above checks before putting the child there.

Interviews

The interview should assess the merits of each candidate against the job requirements, and

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explore their suitability to work with children. All interviews will be done by at least two people. One member will observe and assess the candidate, and make notes, while the candidate is talking to the other. Bring interviewed by 2 people also reduces the possibility of any dispute about what was said or asked during the interview.

Invitation to interview

In addition to confirming the normal arrangements for interviews, the invitation to the candidate will explain how the interview will be conducted and the areas it will explore including suitability to work with children.

The invitation will also stress that the identity of the successful candidate will need to be checked thoroughly to ensure the person is who he or she claims to be, and that where a DBS Disclosure is appropriate the person will be required to complete an application for a DBS Disclosure straight away. Consequently all candidates will be required to bring with them documentary evidence of their identity to satisfy DBS requirements, i.e. either a current driving licence or passport including a photograph, or a full birth certificate, plus documents such as a utility bill or financial statement that shows the candidate's current name and address, and where appropriate change of name documentation.

All new members of staff will undergo an induction that includes familiarisation with the company's safeguarding and child protection policy and identification of their own safeguarding and child protection training needs. All staff sign to confirm they have received a copy of the child protection policy (see: appendix 2).

17. Behaviour And Conduct

This Code of Conduct applies at all times when performing official duties including when we are representing British Guardianship at training events, conferences and attending work - related social events.

The primary aim of this is to promote good relationships, so that people can work together with the common purpose of helping everyone to learn, grow and develop. This policy aims to support everyone to work together in an effective and considerate way.

British Guardianship is committed to creating and maintaining an environment for children, parents, visitors and employees which is professional, child centred, safe and free of any form of unlawful or inappropriate behaviour.

All employees of British Guardianship have an obligation to ensure their personal conduct and behaviour is at all times professional and lawful and does not reflect adversely on the reputation of British Guardianship.

- Staff have a responsibility to maintain public confidence and must uphold high standards of personal conduct to do so; both within and outside of their work setting.
- Staff must not do or say anything that might bring the company into disrepute.

All employees of British Guardianship are required to perform their duties to a high standard and demonstrate impartiality and integrity in fulfilling their responsibilities. Employees are to ensure there is no real or apparent conflict of interest between their private activities and their official duties. All employees of British Guardianship are required to:

- Place the welfare of children as their first and paramount consideration.
- Accept responsibility for their own actions and behaviour and avoid any conduct that might lead any reasonable person to question their motivation and intentions.
- Work in an open and transparent way.

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- Make a record of any incident and promptly consult their line manager.
- Apply the same professional standards, regardless of gender, race or sexual orientation.
- Be aware of the name of the Designated Safeguarding Lead with responsibility for safeguarding children and understand their responsibilities under the safeguarding / child protection policy.

Confidentiality

- Staff must not use confidential or sensitive information about a British Guardianship students or their family for their own benefit or to humiliate or embarrass a child.
- Confidential information about British Guardianship students should not be shared with other departments of the company.
- Information that might suggest that a child is in need or at risk of significant harm must be shared with the Designated Safeguarding Lead in accordance with the safeguarding / child protection procedures.

Clothing and uniform

As you will come into contact with children, parents, other professionals, visitors and members of the public, it is important that you present a professional image with regard to appearance, standards of dress and personal presentation.

18. British Guardianship E-safety Regulations

As part of British Guardianship wider duty of care it will ensure that Staff, Children and young people are able to use the internet and related communications technologies safely and appropriately.

British Guardianship will take all reasonable precautions to ensure that users access only appropriate material. However, due to the global and connected nature of Internet content, it is not possible to guarantee that access to unsuitable material will never occur. The Organisation cannot accept liability for the material accessed, or any consequences resulting from Internet use.

Our compromise with families and staff members is to use all available resources to establish an adequate Internet Use Policy and insure that the implementation is appropriate.

Guidelines for professional

The use of computer systems without permission or for inappropriate purposes could constitute a criminal offence under the Computer Misuse Act 1990. Methods to identify, assess and minimise risks will be reviewed regularly. When using any form of ICT, including the Internet, in Office and outside the Office, especially around our student all adults must for your own protection: Ensure all electronic communication with students, parents, carers, British Guardianship staff members and others is compatible with your professional role and in line with British Guardianship policies.

- Do not talk about your professional role or disclose any confidential information in any capacity when using social media such as Facebook and YouTube.
- Do not put online any text, image, sound or video that could upset or offend any member of British Guardianship organisation or be incompatible with your professional role.
- Use British Guardianship ICT systems and resources for work related access only. This includes your British Guardianship email address, British Guardianship mobile phone and British Guardianship video camera.
- Do not give out student/parents/host families personal details, such as mobile phone number, personal e-mail address or social network details to unauthorised people.
- Do not disclose any passwords and ensure that personal data (such as data held on British Guardianship Folders) is kept secure and used appropriately.
- Only take images of students and/ or staff for professional purposes, in accordance with school policy and with the knowledge of Guardianship Manager.

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- Do not browse, download, upload or distribute any material that could be considered offensive, illegal or discriminatory.
- Ensure that your online activity, both in office and outside the office, will not bring your organisation or professional role into disrepute.
- You have a duty to report any Internet Use incident which may have an impact on you, your professionalism or your organisation. For Internet Use support and guidance please contact our IT manager on **+44 (0) 1273 72 55 77**.

For British Guardianship staff, the following list of offences will be considered as misconduct and will lead to a disciplinary review:

- Abuse, misuse or neglect IT systems within the company.
- Misuse of the internet and/or email to access or distribute material of a pornographic, offensive, obscene or inappropriate nature.
- Excessive use of the internet for personal purposes during working time.
- Accessing information on British Guardianship internal systems for unauthorised purposes or persons.
- Accessing and disclosing information obtained from British Guardianship internal systems for unauthorised purposes or persons.
- Disclosure of confidential information for unauthorised purposes or persons.

Guidelines for Children and young adults for use of phones and mobile phones

Most children will use mobile phones and computers at some time. They are a source of fun, entertainment, communication and education. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. We understand that all boarding schools have got their special regulations on E-Safety; however we believe that as the guardianship organisation, we must as well put in place our own regulations and provide it to all our students prior to their arrival to UK. British Guardianship's e-safety policy explains how we try to keep children safe whilst they are on their own using internet. Cyberbullying by children, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our safeguarding procedures accordingly.

We provide all our British Guardianship students the following policies:

- Students are allowed to use the internet up until 10pm whilst they are with their homestays.
- Never give out identifying information – home address, school name, or telephone number – especially on a public message board such as chat or social media.
- Don't chat with strangers and be sure you only talk with someone both you and your parents know and trust.
- Never arrange a face-to-face meeting with someone you "meet" on the Internet without first seeking permission from your parents and your educational guardian. It is very dangerous!
- You should never respond to messages that are suggestive, obscene, belligerent, threatening, or makes you feel uncomfortable. Speak to your British Guardianship educational guardian in case you receive this type of messages.
- Do not click on any links that are contained in e-mail from persons you don't know. Such links could lead to sexually explicit or otherwise inappropriate websites or could be a computer virus.
- Remember that people online may not be who they seem. Because you can't see or even hear that person it would be easy for someone to misrepresent him or herself. Thus someone indicating "she" is a "12- year-old girl" could in reality be a 40-year-old man.
- Do not post photographs of yourself without your parents' permission.
- All students must allow British Guardianship's Educational Guardians to become familiar with all the activities that you do online.
- Be warned that some material accessible via the Internet might contain items that are

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illegal, defamatory, inaccurate or potentially offensive. You are not allowed to access this inappropriate content.

- Speak up! If you are suffering from Cyberbullying - bullying through Internet applications and technologies such as instant messaging (IM), social networking sites, and cell phones. Please speak up!
- Use of the Internet is a privilege, not a right. Visiting inappropriate sites, or downloading inappropriate files, can result in the cancellation of that privilege. Please be responsible!
- Respect intellectual property rights don't ever share any personal information about your host family on the Internet.
- The illegal download and storage of music and movies as well as the use of tools to access peer-to-peer networks at your homestay is not permitted. In sum: any illegal internet activity at your homestay's home is thus explicitly and fully prohibited.

Online abuse

Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. The NSPCC have identified five forms of online abuse that young people may experience. These include: cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse.

Cyberbullying

Cyberbullying involves using technology to bully people. It can include texting, instant messaging, and posting on social media and gaming websites.

Examples of cyberbullying include:

- Emailing or texting threatening or nasty messages to people.
- Posting an embarrassing or humiliating video of someone on a video-hosting site such as YouTube.
- Harassing someone by repeatedly sending texts or instant messages through an app or in a chat room.

What we expect from all our staff and homestay hosts:

In case the students discuss about being bullied online either by a friend, classmate or a relative with you, please make sure to report this to our **Designated Safeguarding Lead** immediately.

Child sexual exploitation and grooming

Sexual exploitation is a form of abuse whereby children are deliberately persuaded to enter into situations where they receive something (for example, gifts, money, food, accommodation) in exchange for sexual activity. Most victims are female, though there is thought to be considerable underreporting by male victims, who may be confused about their sexuality and be unwilling to draw attention to themselves. Most perpetrators are male, though women may also be involved. Children may be exploited by an individual, several individuals working as an organised group, or by a gang.

Grooming is the process of 'preparing' a boy or girl for a sexual purpose. Grooming is often slow and subtle, continuing for several weeks or months and lulling the child into a false sense of security. It always involves manipulation and deceit.

Two types of grooming are recognised: street grooming which occurs in the community, and online grooming using technology including the internet and mobile phones.

The complexity and challenge of Sexual exploitation and Grooming:

It can be difficult to identify children and young people who are at risk of sexual exploitation.

A fundamental learning point to emerge from cases of sexual exploitation is that many children who try to disclose their abuse are not believed, or value judgements are made by professionals about the young person, suggesting they are 'willing partners' in a lifestyle they

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have 'chosen'.

Remarkably, some young people's concerns and disclosures have been dismissed as groundless because of their challenging behaviour, involvement in crime or history of going missing from home, school or care.

As an education guardianship organisation, we have a responsibility to do all we can to raise awareness of sexual exploitation and grooming and to identify and support any pupil who is at risk of abuse.

Sexual abuse

A child is sexually abused when they are forced or persuaded to take part in sexual activities.

Emotional abuse

Emotional abuse is the ongoing emotional maltreatment of a child. It is sometimes referred to as psychological abuse and can seriously damage a child's emotional health and development

What we expect from our homestay hosts

The age of consent to sexual activity throughout the UK is 16. Children of this age, although above the age of consent, may be victims of sexual exploitation, sexual abuse or rape.

Sexual activity involving a child under 13 is always a criminal offence and our organisation will always refer such concerns to children's social care.

Host families are in direct contact with children during their school holidays and could play an important role in keeping students' safe and supporting them when things go wrong. To help keep our students safe from sexual exploitation and grooming we ask our entire host family members to:

- Promote healthy and safe relationships with the students.
- Raise students' awareness of sexual exploitation and grooming in case a student wishes to discuss sexual matters.
- Make it clear to the student that they cannot guarantee confidentiality but will act in the child's best interests.
- Report any concern about under-age sexual activity to the British Guardianship's Designated Safeguarding Lead, who will decide on the most appropriate course of action. The organisation will follow the RSCB guidance on dealing with under-age sexual activity.

All staff and host family members have a duty to report any inappropriate internet use in which may have an impact on the student such as computer / Internet addiction symptoms. Also in case the students discuss about exploitation or being bullied online either by a friend, classmate or a relative with you, please make sure to report this to our Designated Safeguarding Lead immediately.

Mrs. Poliane Costa: Mobile: **+44(0) 7841 611 284**, Email: **polly@britishguardianship.com**

Managing Internet use complaints

Complaints of Internet misuse will be dealt with under the Company's Complaints Procedure. Any complaint about staff misuse will be referred to the company's Guardianship Director & Client Relations and will be dealt with based on the company's E-safety regulations.

Guardianship Director & Client Relations: **Ms. Tannaz Fatoorehchi**
Office Number: **+44 (0) 1273 72 55 77** / WhatsApp only: **+447935646492**
Email: **tannaz@britishguardianship.com**

19. Guidelines For Missing and Absent Students

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Definitions (Absent vs Missing)

British Guardianship adopts the National Police Chiefs Council (NPCC) definitions to ensure consistent assessment and response when a student cannot be located:

Absent

A child or young person who is not at a place where they are expected or required to be, and there is no apparent risk to their safety or wellbeing. Absent cases require reasonable enquiries and monitoring but do not require an immediate police response.

Missing

A child or young person whose whereabouts cannot be established, and where the circumstances are out of character, or indicate they may be at risk of harm, exploitation, crime, or danger, or may pose a risk to themselves or others. Missing cases require immediate escalation, including notification to police.

These definitions guide all decision-making and determine whether a situation follows the Absent or Missing response pathway.

This section must be read in conjunction with the British Guardianship Missing & Absent Student Policy, which contains the detailed procedures, risk assessment requirements, and escalation pathways for Absent and Missing cases.

British Guardianship Missing and Absent Student Policy applies to all our students. The welfare of all of our students is our paramount responsibility. Every adult who works with British Guardianship has been trained to appreciate that he or she has a key responsibility for helping to keep all of the kids safe at all times and to ensure that every child is appropriately supervised.

We ask all schools and host families to meet the requirements of the British Guardianship Company by taking the following steps to minimise the risk of a child/children becoming lost whilst in my care.

- Ensure premises are secure and take steps to prevent unauthorised persons entering the premises.
- Ensure to supervise the child closely when visiting places in the community such as the local parks, museums and shops.
- Teach the children about how to keep safe, so they also know the procedure to take should in the unlikely event, they become separated from you.
- Advise children what to do if they find themselves lost.
- With parental consent carry an up-to-date photograph of each child in your care.
- Recognise children's age and stage of development of the children and will identify a meeting point on arrival at the venue should we get separated.

On discovering that a child has gone missing, you must:

- Immediately make a search of the surrounding area.
- Request help from people around you.
- If you are in a public building, I will alert the staff of the situation and ask for assistance in searching for the missing child.
- If you are in a place where it is possible to seal off exits and access CCTV, then you need to request that this is done immediately.
- People involved in the search will be given a description of the child and what the child is wearing.
- As a rule, the younger the child, the more quickly secondary action is required. If the child is missing from your premises for more than 5 minutes, you should contact British Guardianship immediately.

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- Designated Safeguarding Lead should be the contact point. In her absence, the Guardianship Director & Client Relations of the company should be contacted to ensure that alternative arrangements are in place. This information to be communicated to all adults involved in the child care.

If the search is unsuccessful:

- Designated Safeguarding Lead should contact the police as soon as it has been ascertained that the child is missing – this may well be within ten minutes.
- British Guardianship Staff should continue to search even after the police have been called.

Action to be taken once the child is found:

- Talk to, take care of and, if necessary, comfort the child.
- Designated Safeguarding Lead will speak to the parents of children involved to discuss events and give an account of the incident.
- Designated Safeguarding Lead or the Guardianship Director & Client Relations will promise a full investigation (if appropriate involving Social Services/ Local Children Safeguarding Board)
- The investigation should involve all concerned providing written statements.

The report should be detailed covering: time, place, numbers of adults and children, when the child was last seen, what appeared to have happened, (the purpose of the outing), the length of time that the child was missing and how s/he appeared to have gone missing, lessons for the future.

You need to consider any missing or lost child incident to be a 'significant event' and will therefore inform British Guardianship. We also ask you to review your actions to establish what went wrong and how it can be avoided in future.

20. Child Protection Policy

Child protection refers to the processes undertaken to meet statutory obligations laid out in the Children Act 1989 and associated guidance (see Working Together to Safeguard Children, An Interagency Guide to Safeguard and Promote the Welfare of Children) in respect of those children who have been identified as suffering, or being at risk of suffering harm.

Child Protection" is a part of safeguarding and promoting welfare to protect specific children, who are suffering or are at risk of suffering significant harm.

This policy describes the British Guardianship reaction towards dealing with students who are suspected of, or are suffering abuse or neglect and preventing the impairment of their health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective and nurturing care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

Policy owner: Director of Safeguarding and Operations

Date introduced: May 2016

Policy

We aim to ensure that children in the care of British Guardianship, at all times experience a caring and secure environment in which they feel safe, respected, valued and cared for. British Guardianship has policies and procedures in place in order to achieve this.

- Ensures that all guardianship personnel and personnel offering outsourced services, who come into direct contact with students in our care, are recruited using safe recruitment practices and are formally screened through the DBS Enhanced Criminal Records Bureau.
- Promotes a policy of openness, trust, and clear communication between all parties – school,

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students, parents, overseas agents, host families and British Guardianship staff.

- Maintains links with appropriate accreditation bodies, governmental authorities with jurisdiction in matters pertaining to child welfare matters.
- To have an appointed Designated Safeguarding Lead who is able to respond appropriately and take the necessary actions if complaints of abuse are reported.
- Ensures that all Guardianship personnel and students in our care are aware of the need to report any allegations or suspicions of child abuse (as stated above) to the appointed Designated Safeguarding Lead.
- Will investigate, record and report all complaints to the appropriate authorities in accordance with the guidelines set out in the Child Protection Policy.

Child protection principles

- British Guardianship has a Designated Safeguarding Lead, Poliane Costa, who has undergone child protection training. Poliane is available for consultation by staff.
- All staff are obliged to read and sign the British Guardianship **Code of ethical practice** (See Appendix 2).
- All staff in the office have achieved 'Child-Safe' Child Protection Training (Level Two).
- All staff are asked to read and sign the British Guardianship **Confirmation of receipt of safeguarding children and child protection policy** (See Appendix 2).
- All staff are responsible for children while on excursions and must make sure that health and safety guidelines are adhered to.
- All vehicles hired for outings must be insured, roadworthy and fitted with seatbelts.
- All drivers should have up to date enhanced DBS with barred list checks and been subject to appropriate recruitment procedures. All drivers should agree to abide by these guidelines.
- All homestay hosts who are 16 or over should have up to date enhanced DBS certificate.
- Checks undertaken by British Guardianship and been subject to appropriate recruitment procedures.
- All homestay hosts are responsible for children while they are staying with them and must make sure that British Guardianship's health and safety guidelines are adhered to.
- All homestay hosts are obliged to follow the step by step missing Child Policy rules if a child goes missing while on a school holiday with them.

Code of conduct

British Guardianship endorses the following code of conduct to provide guidance to our employees and volunteers responsible for activities involving children and young people under the age of 18 years. The code serves to protect children and reduce any opportunities for abuse or harm to occur. Management and employees all agree to abide by code of conduct.

Management will:

- Be responsible for the overall welfare and wellbeing of all staff.
- Be accountable for managing and maintaining a duty of care towards all staff.
- Appoint Designated Safeguarding Lead and Safeguarding Officer to provide information and support to all staff, children, young people and their families regarding child protection matters.

Employees will:

- Be responsible for the administration and excursions of British Guardianship.
- Maintain a duty of care towards others and be accountable for matters relating to the aim and purpose of British Guardianship.
- Establish and maintain a child safe environment in the course of their work.

All staff will:

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- Be fair, considerate and honest with others.
- Treat children and young people with respect, listen to and value their ideas and opinions and protect their wellbeing.
- Operate within the rules and policies of British Guardianship and its activities.
- Be professional in their actions through their use of language, presentation, manner and punctuality.
- Resolve conflicts fairly and promptly and report and act on any breaches of these standards of behaviour through established procedures.
- Maintain strict impartiality.
- Comply with specific organisational guidelines on physical contact with children.
- Respect the privacy of children and their families and only disclose information to people who have a need to know.

All staff will not:

- Use prejudice, oppressive behaviour or language with children.
- Discriminate on the basis of age, gender, race, culture, vulnerability or sexuality.
- Initiate any kind of physical contact with children, touch the children or do things of a personal nature that children can do for themselves.
- Develop 'special' relationships with specific children for our own needs.
- Show favouritism through the provision of gifts or inappropriate attention.
- Have contact with children outside of the organisation's offering.

Professional code of conduct in relation to child protection and safe guarding for homestay hosts

This section relates to the Child Protection Policy and the Host Family Guidelines, which is provided at time of application.

The homestay hosts will sign an agreement providing:

- Agreement to work under the Child protection policy as a condition of working for British Guardianship.
- Provisions regarding acceptable behaviour – not to use physical punishment or chastisement, not to use language intended to belittle or humiliate children and not to abuse children in any way.
- To report any concerns you may have about the protection of children.
- To observe confidentiality and not talk about any situations of actual or suspected abuse that occurs.
- To abide by all organisation directives as laid out in the Risk Assessment pack.

Health And Safety Guidelines

British Guardianship will give home stay hosts and student all relevant contact information. It is however a good idea to double check that you and the student both have the correct information. Please pay special attention to the information over page regarding curfew times and ensure that you follow the guidelines according to the age of your student. Students are told that they must keep their host families informed of their whereabouts at all times. It is also the responsibility of the host to make sure you know where your student is. If you have any queries, please contact British Guardianship. To qualify to become a British Guardianship homestay host, you will have had to comply with a health & safety check. Smoke alarms and Carbon Monoxide Alarm should be fitted in the house. Explain escape routes and access to outside doors/gates and the location of any necessary keys (i.e. back door). Safety is one of our major concerns and all of our hosts are required to adhere to the following safety rules which are routinely checked.

- Electrical wiring and modifications must be up to date and meet updated standards.
- You must prevent fire dangers with the usage of guards with all fires and heaters. Please make sure to keep clothing and other stuff away from all heat sources, i.e.: candle.
- In case of the associated risks with windows, you should try to minimise the risk of falls from

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windows by installing and using restrictor clasps on all upstairs windows and place furniture away from windows.

- You must reduce the likelihood of household fires and carbon monoxide poisoning from faulty flues or equipment by having gas, oil or solid fuel heating appliances professionally serviced once a year.
- If you have a gas boiler or any gas appliances, you are required to have a current certificate issued by a GAS-SAFE registered plumber.
- Rooms where the gas appliances are located must have adequate ventilation –air inlets should not be blocked to prevent draughts, and flues and chimneys should not be obstructed.
- You must have smoke alarms fitted.
- You must establish escape routes in case of fire for all occupants from your house.
- (Our accommodation team can advise on drawing up a fire risk assessment document.)
- Your electrical wiring must be up-to-date and in good order.
- You should be aware of the health and safety regulations with regard to cooking and keeping food.

Damage and breakages occur occasionally and hence it is the responsibility of the host family to guarantee that they have adequate home substances and buildings insurance to cover any sensible unintended damage that may happen while the student is with them.

The law

Whilst we come across very few problems, the points below have been brought to all British Guardianship students, their parents' and the homestays' attention and needs to be signed by the time of application. The law - students must follow all national and local laws – failure to do so can result in disciplinary action / prosecution / deportation whichever action is appropriate.

- Do not buy/consume alcohol or tobacco.
- Over 18 Students may only drink with the hosts express permission and under their supervision they have been advised otherwise by British Guardianship.
- Students are not allowed to have sex.
- Possession and consumption of drugs is against the law.
- Students must be careful not to steal.
- Students must be instructed to do not threaten/commit or take part in any act of violence.

Child protection reporting procedure

It may help if you write down, for your own benefit, what you have observed or heard that is causing alarm. One useful way to decide whether your concern should be reported is to consider whether you would want the conduct of this member of staff to continue unchecked if your own child or another young family member was involved.

- You may raise your concern verbally or in writing. You should report your concern directly to the Designated Safeguarding Lead.
- If the Designated Safeguarding Lead is the subject of your concern, speak to the Guardianship Director & Client Relations.
- Ensure the Designated Safeguarding Lead or Guardianship Director & Client Relations informs you of their proposed action and sets a date for a second meeting.
- Timescales will depend on the complexity of the initial inquiry but the case should not be allowed to stall and you should receive initial feedback within 10 working days. The timescale for subsequent feedback should then be agreed.
- Ask for clarification about confidentiality and ensure you have your wishes regarding the protection of your identity recorded.

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Process and outcome.

The Designated Safeguarding Lead or Guardianship Director & Client Relations will make enquiries to establish the facts of the matter and whether poor practice or inappropriate conduct has occurred. Other company staff may be asked to provide information or advice.

- The Local Authority Designated Officer (LADO) will be contacted by the Designated Safeguarding Lead where there is sufficient information to suggest that a child has, is being or is at risk of abuse.
- The LADO will be contacted for further advice from the relevant statutory authority, or where appropriate an immediate referral will be made to the relevant area's Children's Services or MASH.
- LADO for each local area can be contacted via the Local Safeguarding Partnership (LSP) (formerly Local Safeguarding Children Board – LSCB) for the area in which the student is located. These details are available via local authority safeguarding websites.
- For urgent cases, the police will be notified immediately via telephone number 999.

If, at any stage in the process, there is reason to believe that a child is at risk of significant harm, children's social care will be immediately involved.

Alternatively you can seek advice from your union or professional association, a solicitor, the police or children's social care.

21. Confidentiality, Data Protection and Privacy Policy

British Guardianship staff have access to personal confidential information about students, their families, and staff members. This information is stored and processed in accordance with the UK GDPR and the Data Protection Act 2018. The principles of this Act are considered when sharing confidential information when legally permissible and when in the interests of the child. British Guardianship adhere to the principles of the Act which are to ensure that the information is: – used fairly and lawfully - used for limited, specifically stated purposes - used in a way that is adequate, relevant and not excessive - accurate – kept for no longer than is absolutely necessary - handled according to people's data protection rights - kept safe and secure - not transferred outside the European Economic Area without adequate protection.

For safeguarding and child protection purposes, records relating to a student are normally retained until the student reaches the age of 25, unless a longer retention period is required due to serious safeguarding concerns, statutory involvement, or legal proceedings, as determined by the Designated Safeguarding Lead.

British Guardianship will only share records with those who have a legitimate professional need to see them. Staff should never use confidential or personal information about a pupil or her/his family for their own, or others advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the child.

Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis.

In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously. There are some circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities.

If a child – or their parent / carer – makes a disclosure regarding abuse or neglect, the member of staff should follow the setting's procedures. This means that staff: need to know the name of their Designated Safeguarding Lead and be familiar with the Local Safeguarding Partnership (LSP) child protection procedures and guidance: are expected to treat information they receive about pupils and families in a discreet and confidential manner should seek advice from a senior member of staff (Designated Safeguarding Lead) if they are in any doubt about sharing information

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they hold or which has been requested of them need to be clear about when information can/must be shared and in what circumstances need to know the procedures for responding to allegations against staff and to whom any concerns or allegations should be reported & need to ensure that where personal information is recorded using modern technologies that systems and devices are kept secure should not promise confidentiality to a child or parent, but should give reassurance that the information will be treated sensitively.

If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek guidance from the Designated Safeguarding Lead. Any media or legal enquiries should be passed to senior management. Enquiries or complaints in relation to misuse of data should be directed to Tannaz Fatoorehchi, Guardianship Director & Client Relations.

22. Staff and Enhanced Disclosure and Barring Service (DBS) Checks

British Guardianship conducts an enhanced DBS checks for their head office staff, Local Coordinators and host families (who are classed as volunteers). This DBS check along with registration to the Disclosure and Barring Service Update Service is a fundamental requirement of becoming and remaining one of these staff members for British Guardianship.

British Guardianship does not conduct its own checks for our suppliers though does require sight of an original and valid enhanced DBS certificate before we utilise their service. Details of these checks are recorded securely on our database. The database is only accessible by accredited Head Office staff members with a username and password and information is protected by British Guardianship compliance with the Data Protection Act (1998).

British Guardianship collects the following information about staff members (i.e. Head Office staff, Local Coordinators, host families) in the following ways:

Staff members are asked to submit an application form for an enhanced DBS certificate. For host families this includes every member of your household who is aged 16 years and over. This application will be made to the DBS (Disclosure and Barring Service) via an online disclosure system. The DBS helps employers make 'Safer Recruitment' decisions and prevents unsuitable people from working with vulnerable groups including children. The DBS replaces the Criminal Records bureau (CRB) and Independent Safeguarding Authority (ISA).

On receipt of an application, a British Guardianship representative will inspect their original documents to confirm identity. Once the British Guardianship representative has sighted and verified the documents, the filled forms will be directly submitted online through the Study First Group Portal.

British Guardianship will ask applicants whether they have already subscribed to the DBS Update Service and if the answer is yes, then British Guardianship will request they provide their Update Service ID. The Disclosure and Barring Service Update Service allows applicants and employers to conduct future checks to be carried out to confirm that no new information has been added to the certificate since the date of issue. This allows for portability of a certificate across employers. British Guardianship needs this information so that they can conduct an enhanced criminal record for their prospective staff members and suppliers. This check is relevant as the applicant is seeking a role in the child workforce and will assist British Guardianship in making safer recruitment decisions.

British Guardianship has a legal obligation to abide by the Data Protection Act 1998 and as part of this, they must provide a policy for secure storage, handling, use, retention and disposal of Disclosures and Disclosure information which is outlined below:

British Guardianship policy for handling of DBS certificate information:

Once the application is submitted by head office and result has been sent to the Host Family, we ask a copy from the host and only if the result is clear, we offer the host family the option of registering with the government update service website and signs that person up for the Safeguarding Children & Child Protection Policy

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automatic Update Service. If the DBS check is returned with a conviction marker the Designated Safeguarding Lead makes decision as to whether the Host Family will be used. The DSL can obtain a copy of the certificate from the named person to further assess the applicant's suitability for hosting.

The appointed lead for questions, concerns or complaints about the way in which British Guardianship conduct their criminal record checks is the: (Refer to Complaints Policy)

Guardianship Director & Client Relations: Tannaz Fatoorehchi, Number: +44 (0) 1273 72 55 77

Email: tannaz@britishguardianship.com

23. Welfare, Health and Safety

The Workplace (Health, Safety and Welfare) Regulations 1992 cover a wide range of basic health, safety and welfare issues and apply to British Guardianship as a workplace. British Guardianship takes their duty under the Health and Safety at Work Act 1974 seriously to ensure, so far as reasonably practicable, the health, safety and welfare of their employees at work.

British Guardianship has a Health and Safety Policy which outlines the roles, risks and emergency procedures to follow. The policy is given to the staff at the time of employment. The policy is reviewed annually.

24. Key Contacts

The company is aware of how to access local agency contacts. This includes Local Safeguarding and Children's Boards across the country, how to access locally agreed interagency procedures, guidance and members of the Board. In addition, the company is aware of the non-emergency reporting procedures via the Local Authority's Children's Services relevant to the area or Multi-Agency Safeguarding Hub (MASH), or by telephoning the non-emergency Police number **101**.

For emergency situations, the company is aware of the need to contact the relevant police force for the area by dialing **999**.

Designated Safeguarding Lead and Guardianship Manager: **Mrs. Poliane Costa**

Office Telephone: **+44 (0) 1273 764 716** / Mobile, WhatsApp: **+44(0) 7841 611 284**

Email: polly@britishguardianship.com

Guardianship Coordinator: **Megan Lowe**

Office Number: **+44 (0) 1273 72 55 77** / WhatsApp Only: **+447988339699**

Email: megan@britishguardianship.com

Guardianship Director & Client Relations: **Ms. Tannaz Fatoorehchi**

Office Number: **+44 (0) 1273 72 55 77** / WhatsApp Only: **+447935646492**

Email: tannaz@britishguardianship.com

Internal Complaints (Non-Safeguarding Matters): **Ms. Almu Vilchez**

Office Number: **+44 (0) 1273 72 55 77**

Email: almu@britishguardianship.com

Emergencies - out of office hours

Mobile: **+44(0) 7841 611 284 / +44(0) 7969 688294**

British Guardianship online:

www.britishguardianship.com / info@britishguardianship.com

Public services help lines

If there is a threat to life, in the case of serious injury or a serious incident requiring intervention,

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dial British Guardianship Emergency Line on **+44(0) 1273 764 716** and ask them to call **999**.

Police Emergency: 999 / Police Non-Emergency: 101 / NHS: 111

Doctor's out-of-hours service: **08450 568060**

NSPCC Hotline: **0808 800 5000**

Brighton & Hove Safeguarding Children Partnership (LSP): **+44(0)1273 292 379**

Brighton and Hove Local Authority Designated Officer: LADO: **+44(0)1273 295 643**

Anti Cyber-bullying Website:

www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/bullying-and-cyberbullying/

Childline

Visit: **www.childline.org.uk** / Call: **0800 1111**

Coram Voice

Provides advocacy and advice to children in care or living away from home

Visit: **www.coramvoice.org.uk** / Call: **0808 800 5792**

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25. Appendices

Appendix 1

Company's Record of Concern Form

Use this form to record any concern about a child's welfare and give it to the Designated Safeguarding Lead for child protection:

Child's full name:	
Date of this record:	
Why are you concerned about this child?	
What have you observed and when?	
What have you heard and when?	
Date and time you handed this form to the designated person:	
Your name and designation:	
Signature:	
Have you spoken to the child?	YES ☐ NO ☐
What did they say? Use the child's own words:	
Have you spoken to anyone else about your concern?	YES ☐ NO ☐
Who?	
Is this the first time you have been concerned about this child?	YES ☐ NO ☐
Further details:	

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Appendix 2

Child Protection Policy and Code of ethical practice for British Guardianship staff

All staff are valued members of the company's community. Everyone is expected to set and maintain the highest standards for their own performance, to work as part of a team and to be an excellent role model for our children.

All company's staff should:

- Place the safety and welfare of children above all other considerations.
- Treat all members of the community, including children, parents, colleagues and host family members with consideration and respect.
- Adhere to the principles and procedures contained in the policies in our safeguarding portfolio.
- Treat each child as an individual and make adjustments to meet individual need.
- Demonstrate a clear understanding of and commitment to non-discriminatory practice.
- Recognise the power imbalances between children and staff, and different levels of seniority of staff and ensure that power and authority are never misused.
- Understand that staff are in a position of trust and that sexual relationships with a child, even over the age of 16, may be an offence.
- Be alert to, and report appropriately, any behaviour that may indicate that a child is at risk of harm.
- Encourage all children to reach their full potential.
- Never condone inappropriate behaviour by children or staff.
- Take responsibility for their own continuing professional development.

Date: _____

Staff Name: _____ Signature: _____

For complete details, please refer to our separate policy documents available from British Guardianship or online at: <https://www.britishguardianship.com/our-policies/>

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Appendix 3

Complaints & whistleblowing escalation flow

This flow diagram explains how British Guardianship staff, volunteers, contractors and homestay providers should raise concerns and how these will be escalated. It distinguishes safeguarding and child protection concerns—which must always be reported immediately to the Designated Safeguarding Lead (or Deputy), with statutory agencies contacted where there is immediate risk—from non-safeguarding matters, which should follow internal reporting routes, with external whistleblowing and escalation options available if issues cannot be raised internally or remain unresolved.

