Academic Guardians UK

Safeguarding & Child Protection Policy

This policy summarises current working practices in relation to safeguarding children and young people of any age, who may be at risk of abuse in the context of Academic Guardians UK activities.

This document details the policy aims, safeguarding measures, safer recruitment strategy, response to individual concerns, use of IT and the internet, Information Sharing and Confidentiality. It also describes Academic Guardians UK response to dealing with students who are suspected of, or are suffering abuse or neglect, or who are at risk of suffering from harm as a result of abuse or neglect. This document also details the child protection roles and responsibilities of staff, the procedures for identifying and managing child protection concerns and issues and for mitigating risks to the safety and welfare of students.

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Policy owner	Updated	Review date
Andrew Kettle	August 2025	August 2026

Academic Guardians UK Ltd – Safeguarding & Child Protection Policy

Policy:	Safeguarding & Child Protection Policy
Summary:	This policy summarises current working practices in relation to safeguarding children and young people of any age, who may be at risk of abuse in the context of Academic Guardians UK activities. This document details the policy aims, safeguarding measures, safer recruitment strategy, response to individual concerns, use of IT and the internet, Information Sharing and Confidentiality. It also describes Academic Guardians UK response to dealing with students who are suspected of, or are suffering abuse or neglect, or who are at risk of suffering from harm as a result of abuse or neglect. This document also details the child protection roles and responsibilities of staff, the procedures for identifying and managing child protection concerns, including mental wellbeing, and issues and for mitigating risks to the safety and welfare of students.
Policy Owner:	AGUK (Academic Guardians UK Ltd) Directors
Date Introduced:	August 2016 Update: August 2025
Next Review Date:	August 2026

Academic Guardians UK Ltd – Safeguarding & Child Protection Policy

1. Policy

1.1. This document details the policy aims, safeguarding measures, safer recruitment strategy, response to individual concerns, use of IT and the internet, Information Sharing and Confidentiality. It also describes Academic Guardians UK response to dealing with students who are suspected of, or are suffering abuse or neglect, or who are at risk of suffering from harm as a result of abuse or neglect. This document also details the child protection roles and responsibilities of staff, the procedures for identifying and managing child protection concerns and issues and for mitigating risks to the safety and welfare of students.

1.2. This policy can be accessed via the website www.academic-guardians.co.uk/our-policies; via student/parent/agent portal/; homestay host portal; local coordinator portal and the staff intranet site. The policies are referenced in the student, parent, and homestay host family handbooks as well forming part of the induction process for new staff, freelance and local coordinators and homestay host families. Safeguarding awareness & policy review are also covered in the student first visit.

1.3. This policy focuses on the measures in place for students of any age who are under the care of AGUK.

1.4. This policy supports AGUK's duty to safeguard and promote the welfare of students. This policy is made with reference to Statutory Guidance for Schools and Colleges on Safeguarding Children and Safer Recruitment in Education, Department for Education; Keeping Children Safe in Education (2022) and Working Together to Safeguard Children, 2018 & Local Safeguarding Partnerhsips. AGUK policies and processes are in line with the requirements of the Association of Education and Guardianship of International Students (AEGIS), National Minimum Boarding Standards and sector specific training experts. AGUK refers to various expert sources providing advice on child abuse and safeguarding such as the Local Safeguarding Partners, NSPCC website and Bernado's when developing policies, procedures and managing incidents.

1.5. AGUK Safeguarding & Prevent Contacts – The contact information below is provided via the company website, policies, handbooks, guides and publications, to all those who come into contact with AGUK including, staff, parents, students, schools, homestay host families, drivers, local coordinators, agents and volunteers. All local agency contacts for students are located in the student profile and provided to the student and homestay host when hosting. Students prior to arrival in the UK receive an electronic copy of the student handbook which refers to the policies as well as highlighting how to access help and support. This is also discussed in the student pre-arrival REACH (Remote Education Academic Coaching Help) meeting and subsequent first visit which takes place in the first term of school with a member of the AGUK team.

Designated Safeguarding Lead & Prevent Lead – Director Andrew Kettle who can be contacted on 0203 515 8880, 07823 321 993 or andrew@academic-guardians.co.uk

Deputy Designated Safeguarding Lead – Director Dawn Kettle who can be contacted on 0203 515 8880, 07931 954 106 or dawn@academic-guardians.co.uk

Concerns in relation to the Managing Directors should be addressed to the Director of Safeguarding, Andrew Kettle, Concerns in relation to the Designated Safeguarding Lead should be addressed to Dawn Kettle and vice versa, on a confidential basis without disclosing to the

safeguarding officer the matter relates to. As the DDL & DDSL are connected parties, then concerns about either can also be addressed with the Safeguarding Partners as detailed below. Concerns about all Directors should be directed to Crimestoppers, which will remain confidential.

Safeguarding Partners - Academic Guardians UK registered office is within the borough of Islington whose current safeguarding contact details are as follows:

Website: https://www.islingtonscp.org.uk/are-you-worried-about-a-child

Children's Services Contact Team - +44 20 7527 7400

Local Authority Designated Officer (LADO) - +44 20 7527 8102

Information about services for children can be found on the Islington Family Directory https://www.islingtonscp.org.uk/

Police Referrals - Child Abuse Investigation Team (CAIT) +44 20 8733 6495 or +44 20 8733 6500

For Emergencies - 999

All Local Safeguarding Partnerships & MASH (Multi Agency Safeguarding Hubs) contact details are provided to Homestay Host families, attached to the student profile on confirmation of booking.

A link to the list of Local Safeguarding Partnerships can be found here.

2. Safeguarding Policy and Key Principles

2.1. AGUK understands 'safeguarding' to be to be everyone's responsibility, everyone who comes into contact with children, supported by multi-agency pro-active processes for protecting children at risk of harm or potential abuse. Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes
- Children includes everyone under the age of 18

2.2. Effective safeguarding will reduce the need for action to protect children from harm. AGUK aims to protect children from all types of abuse:

- child sexual exploitation
- radicalisation and extremism
- female genital mutilation
- physical, emotional, sexual abuse or neglect
- domestic abuse

- online abuse
- bullying and cyber bullying
- child trafficking
- grooming

2.3. Academic Guardians has in place a structure for safeguarding young people. The Designated Safeguarding & Prevent Lead (DSL) - Andrew Kettle has designated safeguarding and prevent responsibilities. Dawn Kettle is trained up to the same level to provide Deputy support.

2.4. Staff, homestay hosts, local coordinators & drivers working in direct contact with young people and / or vulnerable individuals on a day-to-day basis may come across signs of harm and/or abuse. Staff and homestay hosts need to ensure that any concerns for the wellbeing of a student is reported to the Designated Safeguarding & Prevent Lead (Andrew Kettle) as quickly as possible (at most, within 24 hours).

2.5. The DSL will invoke the appropriate procedures to protect the young person involving Social Services and the Police if appropriate. Where anyone is unsure and needs guidance about safeguarding issues, they are encouraged to seek support from the DSL.

2.6. Further guidance can be obtained later in this policy under the heading Child Protection and this policy should be read in conjunction with 'Working together to Safeguard Children 2018', 'Keeping Children Safe in Education 2022' and Local Child Safeguarding Board guidance in the area. This policy is in line with AEGIS accreditation.

2.7. AGUK is committed to the welfare and safeguarding of all children and embraces a best practice approach to further educate and support their staff, homestay hosts (host families) and drivers

2.8. All staff, Local Coordinators and Host Families are encouraged to read Keeping Children Safe in Education (Part 1 and Annexe A): https://assets.publishing.service.gov.uk/media/66ce094e8e33f28aae7e1f6d/Keeping_children_safe_in_education_2024_part_one.pdf

3. Safeguarding measures, training and development

3.1. AGUK guardianship students are provided with the student handbook highlighting safeguarding considerations with details of the company's 24-hour seven-day a week emergency numbers and alternative communication methods including social media options such as 'weechat' should they wish to speak to a representative from AGUK.

3.2. AGUK aim to ensure that the students in our care experience always a caring and secure environment in which they feel safe respected and valued. AGUK promote an environment of trust, openness communication between students, schools and AGUK guardianship staff and homestay, so that the student welfare, safety and pastoral care is recognised as a top priority.

3.3. To maintain links with the appropriate agencies a statutory responsibility with child welfare concerns reason to believe that you are suffering from any form of abuse, reported immediately in confidence to Andrew Kettle or Dawn Kettle by telephone at the office or out of hours by mobile telephone.

3.4. Staff, Homestay Host Families, Local Coordinators and drivers are provided with opportunities for continued training and development in their Safeguarding and child protection knowledge. Opportunities arise through in-house training, homestay host family annual update visits and periodic information sharing via email. All staff & homestay hosts are required to obtain a minimum 'Introduction to Safeguarding' (formerly known as level 1) in Safeguarding & Child Protection, with the DSL & DDSL holding a minimum level 3.

3.5. Staff, Homestay Host Families, Local Coordinators and drivers are provided with opportunities for continued training and development in raising awareness around mental health and wellbeing. As an organisation we are committed to respecting the rights and dignity of all children and acknowledge that everyone who is involved in the organisation has mental health and wellbeing needs. All staff know the details of the mental health and wellbeing support services available to both staff and young people, whilst also knowing how to raise concerns to protect young people who are experiencing a mental health problem.

4. Staff & Safer Recruitment

4.1.1. AGUK is committed to safeguarding and ensuring the welfare of children, young people and vulnerable adults and expects all employees and volunteers to share this commitment. The suitability of all prospective employees, local coordinators, drivers and homestay host families and volunteers will be assessed during the recruitment process in line with this commitment.

4.1.2. AGUKs' Safer Recruitment Policy outlines the procedures and steps taken to ensure that the organisation upholds its commitment to safeguarding and ensuring the welfare of children. This policy along with all other policies are available as detailed in 1.2.

5. Homestay host recruitment and procedures

5.1.1. AGUK follows the AGUK Safer Recruitment Policy document for the recruitment of homestay host families, as well as maintaining ongoing monitoring and providing continued support to the families throughout their role with AGUK.

5.1.2. All AGUK homestay hosts are advised to minimise physical contact with students, except for reasons of health and safety, or where physical contact may be a necessary part of organisation (e.g. safe manual handling).

5.1.3. AGUK has a responsibility for the safety of their students and therefore reserves the right to deny appointment to individuals where DBS or social services checks suggest that they may pose a danger.

5.1.4. AGUK will only use homestay hosts with a current enhanced DBS certificate, (child workforce) on all adults and children within the household aged 16 and above.

5.1.5. AGUK will evaluate information about any homestay host family criminal record and make sensible, fair and consistent judgements about whether the individual is safe to engage (or remain engaged) in the employment role, office or voluntary activity.

5.1.6. A social services background check will also be requested for individuals after completing an application form & signing the appropriate authorisation form. AGUK will evaluate information about the homestay host family social services record and make sensible, fair and consistent judgements about whether the individual(s) is/are safe to engage as a host family.

5.1.7. On receipt of the signed application form both personal and professional references will be sought by AGUK.

5.1.8. On receiving positive references and a signed background check authorisation form, and after a telephone conversation with both referees, AGUK will then apply for a social service check on the main carers in the household. A decision will be necessary as to ascertain if the host family will be suitable.

5.1.9. A homestay visit will be arranged by a member of the Academic team. This visit will be used to carry out a risk assessment of the property, review any current DBS certificates and to speak to the family about caring for an international student in their home and to answer any questions on our safeguarding & child protection policy and to give details of how to contact the Safeguarding team.

5.1.10. Should the homestay host family not have a current Enhanced DBS (Child workforce) certificate for all members of the household aged over 16, an Enhanced DBS for everyone will be applied for by Academic Guardians.

5.1.11. A further fair & consistent decision will be made based on the information provided by the Enhanced DBS.

5.1.12. Further to consistent positive information being received a Homestay Host Handbook will be issued to the homestay host family and details of their first student placement will be arranged.

5.1.13. The homestay host will be offered opportunities for engaging with safeguarding training as well as being informed of Safeguarding updates and changes through periodic communications and their annual visit.

5.1.14. AGUK will use their Homestay Information Monitoring Spreadsheet to manage the information being gathered on each Homestay Host Family to ensure the safer recruitment is being correctly monitored.

6. Safeguarding for Taxi Recruitment and Travel

6.1. AGUK have established transport and travel procedures which ensure our internal processes provide the highest levels of safeguarding to our students. The procedures outline processes for booking transfers, sending taxi requests and confirmations to guarantee that students are safely transported to and from the destinations.

6.2. AGUK follows the Safer Recruitment Policy document for the recruitment of transfer companies and taxi drivers as well as, maintaining ongoing monitoring of the companies and induvial.

7. Responding to individual wellbeing & safeguarding concerns

7.1. Not all concerns regarding an AGUK students with be safeguarding concerns. Concerns of a wellbeing nature will be monitored via student, school, homestay host and parent feedback. Feedback is obtained and gathered via regular communication with schools, parents, students and homestay hosts as well as the requisite feedback forms being distributed to school tutors, homestay host and students.

7.2. Wellbeing concerns are recorded and monitored regularly via the Student Information Management Spreadsheets (SIMS) and any actions decided by the directors on a per case basis and recorded in the students personal file on the portal.

7.3. Where the concern is of a safeguarding nature staff, homestay hosts and local coordinators must respond promptly and submit their concerns in writing as laid out in section 8

7.4. All reports to AGUK from Local coordinators, schools, students and parents are initially regarded as children in need. The Deputy Safeguarding Lead is notified, and the matter discussed with the Designated Safeguarding & Prevent Lead. A record is created in the student record file for the incident to be effectively managed, the safety of the student to be maximised and any risk to be minimised. Any report pertaining to child protection will be automatically classified as highest priority.

7.5. An additional student folder will be created in the safeguarding teams (Directors) private secure portal to manage all correspondence and recorded actions.

7.6. The information is evaluated on the day of receipt and a decision made and recorded regarding the next course of action and/or outcome. This could include no further action, AGUK emergency meeting to decide on future actions, or emergency action to protect a child through the statutory authorities (example police or social services) where there is a risk to the life of a child or the possibility of serious immediate harm.

7.7. Where a crime may have been committed the police must be informed at the earliest opportunity, and they will decide whether to commence a criminal investigation. Reporting the matter to the police must be recorded in the student file.

8. Child Protection

8.1. Academic Guardians has a responsibility to protect students that staff or homestay hosts of the organisation that may have contact within the course of their duties or being at the organisation. This policy details the arrangements that the organisation has put in place to provide a safe environment for young people and vulnerable groups. It applies to all students and staff within the organisation.

8.2. Academic Guardians activities regularly extend to individuals under the age of 18.

8.3. Certain individuals are disqualified from working with young people and/or vulnerable adults if they hold a regulated position and/or care positions.

8.4. Academic Guardians seeks to ensure that its policy and procedures comply with statutory duties, reflect guidance and good practice in safeguarding young people and vulnerable adults and that safeguarding arrangements are proportionate and based upon common sense

8.5. Academic Guardians recognises that it has a duty to help homestay hosts and staff (through guidance, support and training), to promote safe practices to minimise risk to vulnerable individuals and protect students, staff, homestay host families and the organisation from the possibility of false allegations. It is not intended that students and staff should be restricted from normal ways of working but are advised to consider how an action may be perceived.

8.6. The following principles underpin our provision and practices in relation to safeguarding and child protection:

- AGUK will provide a safe and secure environment for all students
- Homestay Host families and transfer (transport) companies provide a safe and secure environment for all students
- All students will know how to access help, advice and support - confidentially, quickly and easily and will have access to this support 24/7
- AGUK has in place a Designated Safeguarding & Prevent Lead who has overall responsibility for the safeguarding and welfare of the students.
- The Directors of AGUK have overall accountability for the safeguarding and welfare of the students
- All staff share in the responsibility to protect students from harm, remain vigilant in identifying safeguarding and child protection issues and to follow policies and procedures relating to safeguarding and child protection
- Students, staff, local coordinators and homestay host families have effective means by which they can raise child protection concerns or report issues through regular visits, feedback and exeat communications
- Staff, local coordinators and homestay host families have at least one mechanism to be able to contact and communicate with students quickly

- Staff, local coordinators and homestay host families are aware of the medical and/or learning needs of individual students via Student Records and HF03 documents

- Where the students are believed to be at risk of harm or their whereabouts is unknown to AGUK, procedures to locate the student by the safest and quickest means possible or secure the safety of the student will be activated immediately. Please refer to the missing student policy available as laid out in 1.2

- AGUK has procedures in place which enable child protection concerns and incidents to be dealt with promptly and effectively and in line with current relevant legislation

8.7. The safety and welfare of children or Child Protection means protecting children from physical, emotional or sexual abuse or neglect where there is an identified risk. Safeguarding is the minimisation of the risk to children from all forms of child abuse including for example:

- child sexual exploitation
- radicalisation and extremism
- female genital mutilation
- physical, emotional, sexual abuse or neglect
- domestic abuse
- online abuse
- bullying and cyber bullying
- child trafficking
- grooming

8.8. The 6 Rs Introduction

Safeguarding, if it is to impact on all aspects of the operational life of organisation providers, must become the informed responsibility of all. All staff, homestay hosts, partners and others have a responsibility actively to make the organisation environment safe and secure for all. To do so, they will find it helpful to consider and act on the *5 Rs* –

Recognise - The recognition of abuse is not always easy and AGUK acknowledges that its staff are not experienced in this area and will not easily know if abuse is taking place. Indeed, it is not the place of AGUK staff or partners to make such a judgement. However, it is their responsibility to act on concerns to safeguard the welfare of vulnerable groups.

Whether the abuse may occur in school, on a field trip or whilst with friends or in any other setting in which the student may find themselves, all those playing a role in meeting the students' needs should be aware and informed so that possible abuse can be recognised, investigated and acted on seamlessly and effectively.

Signs and symptoms of abuse of young people and/or vulnerable adults may include direct disclosure. Other people able to identify concerns include tutors, housemasters, staff, colleagues and peers and those offering additional services, such as advisory services.

Respond - If a vulnerable person says something or acts in such a way that abuse is suspected, the person receiving the information should:

- Not give assurances of confidentiality which cannot be kept but should reassure the vulnerable person that the information will only be passed on to those people who need to know.
- React in a calm but concerned way
- Take what the vulnerable person says seriously
- Keep questions to an absolute minimum only to clarify what the vulnerable person is saying, not to interrogate
- Not interrupt the vulnerable person when they are recalling significant events
- Reassure the vulnerable person that the problem can be dealt with
- Make a full record of what is said and done, though this should not result in a delay in reporting the problem

Report - If a student is accidentally hurt. For homestay hosts an accident report (appendix 2) form must be filled in and sent immediately to andrew@academic-guardians.co.uk, or posted to our office address.

- If you are concerned that a relationship is developing that could represent an abuse of trust
- If you are concerned that the student is becoming attracted to you or a colleague who cares for them
- If a student misunderstands or misinterprets something you have done
- If you have had to use reasonable physical restraint to prevent a student harming themselves, or another, or from causing significant damage to property.
- If a student makes an allegation of abuse
- If you see any suspicious marks on a student
- If you notice sudden changes in behaviour

Record - A record of the accident should be filled in. This must be as accurate an account as you can. If appropriate ask the person to sign the record and in all cases the person recording it should sign and date the record. A description of any visible physical injury (clothing should not be removed to inspect the injury) and any dates, times or places and any other potentially useful information.

If a student has sustained an injury and you are unsure what to do please contact NHS Direct (helpline) on 111. Alternatively contact the office on 0203 515 8880. Alternatively, you can call your family doctor if it is within surgery hours and there is an available appointment. Serious accidents please go straight to your nearest A&E.

Referral - Any concerns should be reported immediately to the Designated Safeguarding Lead.

- The Designated Safeguarding Lead will alert the necessary bodies to take the appropriate action using the appropriate referral processes
- Every effort should be made to maintain confidentiality. Suspicions must not be discussed with anyone else other than those nominated above
- The Designated Safeguarding Lead has the responsibility to act on behalf of AGUK in dealing with allegations or suspicion of abuse or neglect. This will include collating details of the allegation or suspicion and referring the matter to the appropriate statutory authorities. For matters where advice is required, the local area's Children Services or MASH will be contacted for expert guidance. For matters that are not deemed necessary for reporting to a statutory agency, the appropriate parties will be updated, for example the student, parents or school
- Under no circumstances should staff or homestay hosts carry out their own investigation into suspicions or allegations of abuse, neither should they question victims closely, as to do so may contaminate evidence and obstruct any investigation that may be carried out subsequently by the Police or Social Services.

Reflect – on learnings from the safeguarding process and on how to support the wellbeing of yourself and others involved.

8.9. The Designated Safeguarding & Prevent Lead

Within the company this is the person who is responsible for receiving concerns about the safety and welfare of children and young people -The Designated Safeguarding & Prevent Lead (DSL) will:

- be accountable for the organisation's safeguarding practice
- ensure that safeguarding is afforded utmost priority within the organisation
- ensure there is a staff structure in place to fulfil safeguarding responsibilities
- develop organisation wide procedures, practice and guidance for safeguarding, ensuring procedures are in place for managing allegations, safeguarding, and safe recruitment practices
- ensure that secure records of safeguarding concerns are stored and shared appropriately

- ensure that monitoring review systems are in place to incorporate new guidance and legislation and to test out existing systems
- be trained to identify signs of abuse and when it is appropriate to make a referral
- ensure AGUK Safeguarding & Child Protection Policies are along with all other policies updated and reviewed regularly
- refer cases of suspected abuse or allegations to the relevant investigating agencies
- act as a source of support, advice and expertise within the organisation when deciding to make a referral by liaising with relevant agencies
- ensure each student of staff and other relevant partners have access to and understands the Safeguarding policy
- ensure all staff have induction training covering Safeguarding and can recognise and report any concerns immediately should they arise
- to maintain links with the appropriate agencies who have a statutory responsibility to deal with child welfare and child protection concerns

8.10. The Child Protection Procedures

8.10.1 All members of the AGUK team are aware of their role to play in safeguarding children and identifying concerns early to allow us to provide early help. Members of the AGUK team who are acknowledged as being part of the wider safeguarding system within the operation include school staff, host families, local coordinators and transfer companies.

8.10.2 Staff members are aware of the system within the company which supports safeguarding and child protection including the policy, staff behaviour and who the Designated Safeguarding Officers are. All staff members receive appropriate child protection and safeguarding training, which is regularly updated. *(Appendix 3 – Summary of Child Protection Training)*

8.10.3 All staff must respond promptly to any safeguarding concerns and submit their concerns in writing as per the policy – Indicators of child abuse in response to concerns and receipt of a suspected report of child abuse by the Designated Safeguarding & Prevent Lead.

8.10.4 All reports to AGUK from Local coordinators, schools, students and parents are initially regarded as children in need. The Deputy Safeguarding Lead is notified. The record is created in the student record file for the incident to be effectively managed, the safety of the student to be maximised and any risk to be minimised. Any report pertaining to child protection will be automatically classified as highest priority.

8.10.5 The information is evaluated on the day of receipt and a decision made and recorded regarding the next course of action and/or outcome. This could include no further action,

AGUK emergency meeting to decide on future actions, or emergency action to protect a child through the statutory authorities (example police or social services) where there is a risk to the life of a child or the possibility of serious immediate harm.

8.10.6 Where a crime may have been committed the police must be informed at the earliest opportunity, and they will decide whether to commence a criminal investigation. Reporting the matter to the police must be recorded in the student file.

8.10.7 All safeguarding concerns and child protection issues are recorded in their Safeguarding files, which remain secure and confidential. An additional student folder will be created in the safeguarding teams private secure portal to manage all correspondence and recorded actions. Dates and notes pertaining to a student are entered onto a monitoring spreadsheet which again remains secure and confidential. Safeguarding and child protection information is stored securely and can only be accessed by the DSL and DDSL.

8.10.8 Liaison with the schools and parents will be done in accordance with the safeguarding and child protection policy, (telephone, skype, face to face meeting and email as appropriate). Depending on the concerns being raised and the decision of the Designated Safeguarding Lead, information will be communicated appropriately and directly with the DSL, parents and schools securely.

8.10.9 Dealing with a disclosure from a child, and a child protection case in general, is likely to be a stressful experience. Children may not feel ready or know how to tell someone they are being abused. The member of staff, local coordinators, driver, homestay host or volunteer should consider seeking support for him/herself and discuss this with the Designated Safeguarding Lead or Deputy Safeguarding Lead (contact details in 1.6).

9. AGUK Professional Code of Conduct for staff

9.1. AGUK Code of Conduct handbook, which is provided and referred to in the induction, outlines the professional code of conduct the staff and local coordinators must follow. It includes acceptable practice and behaviours to avoid.

10. Use of the IT and the Internet (E-Safety)

10.1. AGUK believe information and communications technology includes all forms of computing, the Internet, telecommunications, digital media and mobile phones.

10.2. Any member of the company personnel that uses illegal software or access inappropriate websites when on company premises or using company equipment face dismissal.

10.3. Staff members must be aware of the principles of the computer misuse, copyright and data protection act 1998.

10.4. Use of the Internet, web-based or mobile communications and social media by staff members must be appropriate to the staff member's role, lawful, proportionate and ethical.

10.5. All members of the company are expected to familiarise themselves with the E-Safety Policy and adhere to best practice when using the internet. This policy is available as detailed in 1.2

11. Bullying (including Cyber Bullying and Anti Sexual Bullying)

11.1. AGUK believe that every single child & staff member has the right to be in an environment, free from bullying of any kind and in which they feel safe and supported. Bullying of any kind is deemed unacceptable and will always be treated seriously and acted upon. This policy should be read in conjunction with the Bullying & Cyber Bullying Policy, Behaviour Policy, the Safeguarding policy (including Prevent), the Code of Conduct, and Staff Handbook & Online (E-Safety) policy. All these policies are available as laid out in section 1.2.

11.2. AGUK recognises that a bullying incident involving a student under AGUK care should be treated as a child protection concern when there is reasonable cause to believe that a child is suffering or likely to suffer significant harm. In this instance the points within AGUK's Child Protection procedure should be followed.

12. Whistle Blowing

12.1. AGUK believes whistleblowing to be the reporting of suspected wrongdoing in the workplace, in support of AGUK's commitment to safeguarding and promoting the welfare of children and young people. AGUK expects all staff (including self-employed consultants), partners and volunteers to share the commitment to the company's overall aim.

12.2. By encouraging a culture of openness within the organisation AGUK believes it can help prevent malpractice -- prevention is better than cure. That is the aim of this policy. This policy applies to all employees of AGUK and to other workers within AGUK including, local coordinators, agency workers, and drivers. Whilst homestay host families and students do not benefit from the same statutory protection as staff, the procedures in this policy also apply to them.

12.3. By encouraging a culture of openness AGUK wants to encourage employees, workers, students, local coordinators and homestay hosts to raise issues which concern them. They may be worried that by reporting such issues they will be opening themselves up to detrimental treatment or risking their job security; that is quite understandable but is not the case - all staff have statutory protection if they raise concerns in the right way. This policy is designed to give staff that opportunity and protection. Provided they are acting in the public interest, it does not matter if they are mistaken. There is no question of employees having to prove anything about the allegation they are making but they must reasonably believe that the information they have tends to show some malpractice. While students and homestay hosts do not benefit from the same statutory protection as staff, the procedures in this policy also apply to them. If there is anything which employees, workers, students, local coordinators and homestay hosts think AGUK should know about they should use the procedure outlined in this policy. By knowing about malpractice at an early stage AGUK stands a good chance of taking the necessary steps to safeguard the interests of all staff and protect the organisation. In short, staff, homestay hosts and students should not hesitate to 'blow the whistle' on malpractice. Note: This policy is not the procedure for

general grievances. If an employee has a complaint about their own personal circumstances then they should use the normal grievance procedure, and homestay host and students should follow the complaints policy procedure. If an employee or student has concerns about malpractice within the organisation, then they should use the procedure outlined in this policy.

12.4. AGUK actively encourage all personnel, partners and volunteers to report any serious concerns they may have about any aspect of the company including issues such as:

- health and safety concerns
- damage to the work environment
- the criminal offence that has taken place was about to take place
- disobeying the law
- the covering of the wrongdoing
- the conduct of its personnel or others acting on behalf of the company at work or representing the company and external functions for work or pleasure
- discipline, grievance, harassment and bullying
- recruitment and selection of host families and taxi drivers

12.5. Making a whistle blowing disclosure:

12.5.1 AGUK is committed to this policy. If an employee, local coordinator, homestay host or student uses this policy to raise a concern that is in the public interest AGUK gives them its assurance that they will not suffer any form of retribution or detrimental treatment. AGUK will treat their concern seriously and act according to this policy. They will not be asked to prove anything about the allegation they raise, but they must reasonably believe:

- that the information they have tends to show some malpractice, and
- that the disclosure is in the public interest.

12.5.2 If an employee, local coordinator, student or homestay host asks for a matter to be treated in confidence AGUK will respect their request and only make disclosures to third parties or other staff with their consent.

12.5.3 If an employee, local coordinator, student or homestay host is concerned about any form of malpractice they should normally first raise the issue with their immediate superior. There is no special procedure for doing this -- they can tell that person about the problem or put it in writing if they prefer.

12.5.4 If they feel they cannot tell their immediate superior, for whatever reason, they should raise the issue with a senior member of management.

12.5.5 Homestay Host and students should raise such concerns with the Designated Safeguarding & Prevent Lead or the Deputy Safeguarding Lead (see 1.6 for contact details) in the first instance.

12.5.6 If an employee, local coordinator or student has raised concerns and is still concerned, or the matter is so serious that they feel they cannot discuss it with either of the two persons named above, they can consider raising the matter with the appropriate regulator. A list of the bodies currently listed as regulators for this purpose and the areas they are responsible for is available from Public Concern at Work (see below), and from https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2

12.5.7 The NSPCC have a whistleblowing helpline which is available for staff, local coordinators and homestay hosts who do not feel able to raise concerns regarding child protection failures within the organisation. They can call 0800 028 0285 between 8am and 8pm Monday to Friday or can email: help@nspcc.org.uk.

12.5.8 Additionally, as AGUK is accredited by AEGIS (Association for the Education and Guardianship of International Students) it is also possible to raise a concern with them by contact directly at http://www.aegisuk.net/contact-us

12.5.9 Employees, local coordinators and students may raise a whistle blowing concern anonymously from an anonymised email to Andrew Kettle (andrew@academic-guardians.co.uk) or by post Whistle blowing Policy, Academic Guardians, Kemp House, 152-160 City Road, London EC1V 2NX.

12.5.10 Victimisation of staff or employees who make a whistle blowing disclosure on grounds of that disclosure is never acceptable, and all allegations of such will be investigated fully and (if proved) dealt with severely by AGUK.

12.6 How AGUK will respond

12.6.1 After an employee, student or representative has raised a concern AGUK will decide how to respond in a responsible and appropriate manner under this policy. Usually this will involve a confidential meeting with the whistle-blower. AGUK will then normally make internal enquiries first, but it may be necessary to carry out an investigation at a later stage which may be formal or informal depending on the nature of the concern raised. External investigators such as auditors may be brought in where necessary, and AGUK will cooperative fully (where necessary) which enforcement bodies such as the CMA, police, UKVI, and HMRC, and with regulators. AGUK will endeavour to complete investigations within a reasonable time.

12.6.2 AGUK will keep the employee, local coordinator, homestay host or student informed of the progress of the investigation carried out and when it is completed and will provide feedback throughout the process. AGUK will not be able to inform them of any matters which would infringe the duty of confidentiality owed to others.

12.6.3 AGUK will normally aim to arrange an initial meeting within 48 hours of a disclosure being made and conclude an investigation within 20 working days.

12.6.4 It is not usually possible to provide feedback to staff or students who make anonymous disclosures, although feedback can be requested to an anonymised email account.

12.6.5 AGUK will keep (anonymised) records of: -

- The number of whistle blowing disclosures it receives, their nature, and whether confidentiality was requested
- The date and content of feedback provided to whistle-blowers.

12.7 Advice, support and awareness

12.7.1 In accordance with guidance on whistle blowing published by the Department for Business & innovation, AGUK is committed to raising awareness amongst its staff, local coordinators and homestay hosts of their whistle blowing rights and duties. This policy will be made available on the AGUK website, portals and intranet site. Reference to whistle blowing will be included in the induction process for new staff and managers.

12.7.2 Public Concern at Work (now known as Protect) is a leading independent charity whose main objectives are to promote compliance with the law and good practice in the public, private and voluntary sectors. They are a source of further information and advice for staff whistle-blowers at https://protect-advice.org.uk/

You can also find advice on whistle blowing for employees through ACAS
http://www.acas.org.uk/index.aspx?articleid=1919
Or the .gov website
https://www.gov.uk/whistleblowing/what-is-a-whistleblower

12.7.3 AGUK can signpost and support access to mentoring and counselling for staff during the stressful whistleblowing process if requested by the employee.

13 Confidentiality, Data Protection & Privacy

13.5 AGUK Guardianship staff have access to personal confidential information about students, their families and staff members. This information is stored and processed in accordance with UK General Data Protection Regulations following AGUKs Data Protection Policy and Privacy Policy, which are available on the website and on the organisations SharePoint portals. The principles of this act are considered when sharing confidential information when legally permissible and when in the interest of the child. AGUK will adhere to the principles of the act which are to ensure information is:

- use fairly and lawfully
- used for limited, specifically stated purposes
- using a way that is adequate, relevant and not excessive
- accurate
- checked for no longer than is necessary
- handled according to people's data protection rights
- kept safe and secure

13.6 AGUK will only share records with those who have a legitimate professional need to see them. Information must never be used to intimidate, humiliate, or embarrass a child or their parents.

13.7 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 student, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, only to those with designated safeguarding responsibilities.

13.8 Where personal information is shared or sought, AGUK will use its secure email portal to send and receive this information. AGUK will ensure by regular monitoring that the vendors of all data housing requirements for AGUK are UK GDPR compliant and that all representatives of AGUK operate in accordance with GDPR regulations.

14 Enhanced Disclosure and Barring Service (DBS) Checks

14.5 Academic Guardians is committed to best practice in staff and host family recruitment to ensure the best possible use of the information provided by the Disclosure and Barring Service (DBS) to encourage safer recruitment but to also ensure that people who have been convicted are treated fairly and are given every opportunity to establish their suitability for positions. Use of the DBS disclosure service will be used in conjunction with obtaining personal & professional references and a social services check.

15 Welfare, Health and Safety

15.5 The workplace (health, safety and welfare) regulations 1992 cover a wide range of basic health, safety and welfare issues and apply to AGUK as a workplace.

15.6 AGUK take their duties 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.

15.7 The lead for health, safety and welfare is Andrew Kettle, director.

15.8 AGUK has a health and safety policy statement which outlines the responsibilities, risks and emergency procedures to follow. The policy is available on the AGUK website and SharePoint site.

15.9 The policy is reviewed annually by Andrew kettle.

16 Complaints

16.5 AGUK has a complaints policy and procedures, as we recognise that there may be legitimate concerns of students, parents, agents, host families or transfer companies about the service we provide. As a company we encourage these concerns being made known to AGUK staff so that they can be addressed in partnership with us so that we can continuously monitor and improve our service. The policy and procedures are available on the AGUK website and SharePoint site.

16.6 AGUK also has an internal complaints policy and procedure for staff who have complaints, and staff are made aware of the existence of this policy and the procedures during their formal induction.

16.7 All formal complaints and any actions taken are recorded kept in the directors' portal. A unique folder is created for each formal complaint so that it can be properly managed. A reference to the folder is created in the Complaints Management Spreadsheet (CMS) and all actions correctly recorded and tracked. Staff are made aware of the complaint when and if necessary to do so.

16.8 If complainants are not satisfied with the outcome as decided by AGUK, they can contact AEGIS to report their concerns if they wish to do so (as detailed in the complaints policy, available online at https://www.academic-guardians.co.uk/our-policies

The relevant contact details are set out below:

https://aegisuk.net/app/uploads/2022/03/AEGIS-Complaints-Procedure-22.pdf

Executive Officer
Association for the Education and Guardianship of International Students (AEGIS)
The Wheelhouse, Bond's Mill Estate, Bristol Road
Stonehouse, Gloucestershire, GL10 3RF
+44 (0) 1453 821293
www.aegis.net

Appendix 1

Referral form for Suspicions or Allegations of Abuse of a Young Person

This form is for DSL & DDSL use only. Please complete as soon as possible after receiving information that causes suspicion or an allegation of the abuse of an individual. This must be passed to the relevant authorities as soon as possible after completion.

Note: Confidentiality must be maintained always. Information must only be shared on a need to know basis i.e. only if it will protect the vulnerable person. Do not discuss this incident with anyone other than those who need to know.

Continue a separate sheet of paper if required and attach securely to this form.

Details of person making report

Name:
Position:
Contact telephone numbers:

Details of Individual spoken to:

Name:
Date of Birth:
Address:
Contact telephone number:
Names and address of parents/guardian/carers:

Details of person raising the concern

Name:
Position:
Date of Birth:
Address:
Relationship to individual/vulnerable adult:

If you are reporting this alleged incident on behalf of someone else, please provide details of that person:

Name:
Position:
Address:
Contact telephone number:
Date this person advised you of alleged incident:
Record here the information you were given from this person about the alleged incident:

Details of the alleged incident

Date of alleged incident:
Time:
Place:
Names and addresses of witnesses:
Describe in detail what happened (Please use additional paper if required):

Describe in detail visible injuries/bruises and concerning behaviour of the individual/vulnerable adult, if any (use diagrams if this helps you to describe) (Please use additional paper if required):
Was the individual/vulnerable adult asked what happened: YES/NO
If yes, record exactly what they said in their own words and any questions asked if the situation needed clarifying (Please use additional paper if required):
Details of action taken
Detail what action, if any, has been taken following receipt of this information:
ONLY AFTER SEEKING ADVICE FROM THE POLICE/SOCIAL WORK DEPARTMENT, were the child/ young person/ vulnerable adult's parent's/guardian/carers contacted?

Details of external agencies contacted

Police	Police station contacted: Name and contact number: Advice received:
Social Work Department	Social Work Dept: Name and contact number: Advice received:
Other	Name of organisation: Name and contact number: Advice received

Other information

Record any other information you have about this matter (it is important that all information is passed on even that which you think is not important or helpful).

Signature: _____

Print name: _____

Date: _____

Where a referral has been made to the Police and Social Work Department a copy of this form must be sent to them as soon as possible

APPENDIX 2 – Incident Report form

Name of Host Family or Staff Member:
Address where incident took place:
Exact area/room where incident took place:
Date of incident/accident:
Name of injured person:
School address of injured person:
Nature of incident/injury and extent of injury:
Give details of how and precisely where the incident took place. *Describe what activity was taking place:*
Give details of full action taken during any first aid treatment:
What happened to the injured person following the incident/accident:

All the above facts are a true record of the accident/incident:

Signed: Date:

Name:

Appendix 3 - Summary of Child Protection Training

Summary of Child Protection Training:

- Designated Safeguarding Leads must undertake training every two years (Level 3)
- Teaching and other staff should have training updated every three years (Basic Child Protection Awareness training BCC)
- A record should be kept of dates training took place for all members of staff whilst child protection updates will be discussed at times during the year
- Everyone must be aware of whom the DSL is, and the supporting staff involved in Child Protection within AGUK.

Whilst everyone has had appropriate training the following serves as an aid memoir as regards matters to consider in terms of Safeguarding and promoting the idea that "it could happen here" and that representatives must always act in the best interests of the child. All AGUK personnel must understand that abuse, neglect and Safeguarding issues are rarely standalone events that can be covered by one definition or label.

Abuse and neglect

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

Physical abuse

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

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the 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 cyber-bullying), 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, though it may occur alone.

Sexual abuse (Child on child sexual viaolence and sexual harassment)

Child sexual abuse (CSA) is when a child is forced or persuaded to take part in sexual activities. This may involve physical contact or non-contact activities and can happen online or offline.

Contact abuse involves activities where an abuser makes physical contact with a child. It includes -sexual touching of any part of the body, whether the child is wearing clothes or not; forcing or encouraging a child to take part in sexual activity; making a child take their clothes off, touch someone else's genitals or masturbate; rape or penetration by putting an object or body part inside a child's mouth, vagina or anus.

Non-contact abuse involves activities where there is no physical contact. It includes - flashing at a child; encouraging or forcing a child to watch or hear sexual acts not taking proper measures to prevent a child being exposed to sexual activities by others; persuading a child to make, view or distribute child abuse images (such as performing sexual acts over the internet, sexting or showing pornography to a child); making, viewing or distributing child abuse images; allowing someone else to make, view or distribute child abuse images; meeting a child following grooming with the intent of abusing them (even if abuse did not take place); sexually exploiting a child for money, power or status (child sexual exploitation).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. For more guidance on child on child abuse: Sexual violence and sexual harassment between children (May 2018), has now been merged into Keeping Children Safe in Education 2022

https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges

Domestic Abuse has been added to the list of safeguarding issues that all staff should be aware of. The guidance makes it clear that domestic abuse:

- can be psychological, physical, sexual, financial, or emotional
- can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.

Neglect

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)

- Ensure access to appropriate medical care or treatment it may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Child Sexual Exploitation

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Staff need to be aware of the possibility of this sort of abuse, however, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Female Genital Mutilation (FGM)

All staff and representatives need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Victims of FGM are likely to come from a community that is known to practise FGM. All staff and representatives should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. There is now (from October 2015) a statutory duty to report to the police where it is discovered (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. The non-emergency number for the police is 101. It will be rare for staff and representatives to see visual evidence, and they should not be examining children, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Unless the staff or representative has a good reason not to, they should still consider and discuss any such case with AGUK's designated safeguarding lead and involve children's social care as appropriate.

Upskirting

All staff are now made aware that 'upskirting' is now a criminal offence. A definition has been included which describes upskirting as, "taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm" (DfE, 2019a)

Serious Crime

Keeping Childen Safe in Education sets out specific guidance to support school and college staff in recongnising where pupils may be at risk from serious crime. The guidance sets out what schools and college staff should look out for:

"All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs" (DfE, 2019a)

And what school and college staff need to know:

"All staff should be aware of the associated risks and understand the measures in place to measure these. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its criminal exploitation of children and vulnerable adults: county lines guidance." (DfE, 2019a)

Radicalisation and the Prevent duty

Though it is not felt in general that pupils at school are at a high risk of radicalisation it is vital that all staff and representatives are aware of the possible risks and look for warning signs with the children. There are some steps that are taken to safeguard children's welfare; AGUK's DSL will have overall responsibility to ensure the implementation of the Prevent duty by ensuring that any possible signs of concern such as those mentioned below are highlighted. Any unexplained absences of children are investigated early on the day of absence and parents are asked to give warnings in advance of any absences, either short or long term. If concerns in this area are linked with wider safeguarding concerns, then it may be considered appropriate to make the referral to the Channel programme rather than the usual Children's Services route.

Concerns

All staff and representatives should be concerned about a child if he or she:

- Has any injury which is not typical of the bumps and scrapes normally associated with an accidental injury
- Regularly has unexplained injuries
- Frequently has some injuries (even when apparently reasonable explanations are given)
- Gives confused or conflicting explanations about how injuries were sustained
- Exhibits significant changes in behaviour, performance or attitude
- Indulges in sexual behaviour which is unusually explicit and / or inappropriate to his or her age / stage of development
- Discloses an experience in which he or she may have been significantly harmed.

In addition, any other cause for believing that a child may be suffering harm should be reported. If a crime has been committed the matter should be reported to the police directly. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting, sexting (nude/semi-nude), absenteeism, domestic violence, fabricated or induced illness, faith abuse, gender-based violence, hate and mental health. All staff should be aware safeguarding issues can manifest themselves via child on child abuse.

Procedures

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration. If the concern relates to radicalisation then it may instead be made to the Channel programme. Details of the processes are contained within the Keeping Children Safe in Education document (Section 23). Details of the Channel programme are found at: https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance

Dealing with a disclosure

It's important to note that children may not feel ready or know how to tell someone they are being abused. If a child discloses that he or she has been abused in some way, the member of staff or volunteer should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the child to talk freely
- Reassure the child, but not make promises which it might not be possible to keep
- Not promise confidentiality – it might be necessary to refer to Social Care or other agencies
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, rather than ask direct leading questions
- Not criticise the alleged perpetrator
- Explain what must be done next and who must be told
- Make a written record (see Record Keeping)
- Pass information to the Designated Safeguarding Lead without delay
- NOT allow the child to be interviewed a second time. Accept what the child says and report to the Designated Safeguarding Lead
- Unless there are concerns that speaking to a parent may place a child in danger the DSL should talk to the parents regarding any concerns e.g. a comment made by a child, an unusual mark or bruise.
- A professional judgement is made as to whether the explanation is satisfactory. This decision involves discussion with the Headteacher.

General points on how to respond to a child wanting to talk about abuse:

- Show acceptance of what the child says (however unlikely the story may sound)
- Keep calm
- Look at the child directly
- Be honest
- Tell the child you will need to let someone else know – don't promise confidentiality
- Even when a child has broken a rule, they are not to blame for the abuse
- Be aware that the child may have been threatened or bribed not to tell
- Never push for information. If the child decides not to tell you after all, then accept that and let them know that you are always ready to listen.

Helpful things to say:

- I understand what you are saying
- Thank you for telling me
- It's not your fault
- I will help you

Things not to say:

- Why didn't you tell anyone before?
- I can't believe it!
- Are you sure this is true?
- Why? How? When? Who? Where?
- Never make false promises
- Never make statements such as "I am shocked, don't tell anyone else"

At the end of the conversation:

- Reassure the child that they were right to tell you and show acceptance
- Let the child know what you are going to do next and that you will let them know what happens
- Contact the appropriate DSL
- Consider your own feelings and seek pastoral support if needed

Additional consideration needs to be given to children with communication difficulties and to those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to his or her age, understanding and preference.

Record keeping

When a child has made a disclosure, the member of staff or volunteer should:

- Make brief notes as soon as possible after the conversation
- Not destroy the original notes in case they are needed by a court
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
- Draw a diagram to indicate the position of any bruising or other injury (note that staff should only note injuries that would normally be seen and be careful not to ask children to undress)
- Record statements and observations rather than interpretations or assumptions
- Give all records to the Designated Safeguarding Lead promptly. No copies should be retained by the member of staff or volunteer
- Format for reporting is in the Office portal intranet site

Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, AGUK recognises the importance of information sharing between AGUK, schools and local agencies.

AGUK staff and representatives are encouraged to be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

It is important to note that while the Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure, they do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Appendix 4 – Other Relevant Legislation, Guidance and Codes of Practice

Statutory Guidance for Schools and Colleges on Safeguarding Children and Safer Recruitment in Education, Department for Education, 2018
Keeping Children Safe in Education,2018 – 2024
Working Together to Safeguard Children, 2018
The Children Act 1989
UN Convention on the Rights of the Child (ratified by UK Government 1991)
The Police Act 1997
The Data Protection Act 1998, 2018
UK General Data Protection Regulations 2018
UK General Data Protection Regulations 2022
UK Council for Internet Safety (UKCIS) (UKCIS, 2020)
The Human Rights Act 1998
Public Interest Disclosure Act 1998
Protection of Children Act 1999
Criminal Justice and Court Services Act 2000
Education Act 2002
Sexual Offences Act 2003
Every Child Matters 2003
The Children Act 2004
What to do if you're worried a child is being abused (DfES 2003)
Aim Higher ... Aim Safer: A Framework for Safeguarding Children and Young People in HEIs (2005)