

Safeguarding and Child Protection Policy

Contact Information

Role	Name	Contact
Designated Safeguarding Lead for English Plus Guardians and Prevent Lead	Katherine Milburn	english.plus.wales@gmail.com 07958539922 (24 hour)
Local Authority Designated Officer / Children's Social Care	Rhiannon Lloyd	01492 575111 during office hours (Monday to Friday 9am until 5pm) or 0300 123 3079 outside of office hours.
North Wales Safeguarding Board	NB not for emergencies	https://www.northwalessafeguardingboard.wales/contact/
NSPCC Whistleblowing Advice Line		0800 028 0285 or email help@nspcc.org.uk

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Safeguarding Statement

As a Guardianship organization, our entire focus is on safeguarding the welfare and wellbeing of our students. As Guardians, we represent Parents in their absence, and we take care of Student's wellbeing as we know the Parents would expect us to. We are concerned about the wellbeing of students directly under our care when they are indirectly in our care, for example at school.

We ensure we lead from the top by ensuring that our owners have the appropriate safeguarding knowledge and involvement in the procedures that we have in place. This includes having an oversight of arrangements.

Promoting the welfare of children and young people is everybody's responsibility. As such, although this document focuses on the safeguarding of Students in our care through guardianship, we expect all Team members to apply the same principles for all children.

International students are particularly vulnerable because they are physically far from their families and often in an unfamiliar culture and environment and / or communicating in an unfamiliar language.

Definitions

Safeguarding and promoting the welfare of children – •

protecting children from maltreatment.

- preventing impairment of children's health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to have the best outcomes.

Child Protection: a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Designated Safeguarding Lead (DSL): This is the person identified as taking the lead in safeguarding matters in an organisation. This person will be trained to a higher level.

Prevent: Prevent is the name given to part of the government's strategy to prevent terrorism by reducing the possibility of radicalisation.

North Wales Safeguarding Board (NWSB): consisting of the local authority, the clinical commissioning group within the local authority and the chief office of police within the local authority.

LADO: The role of the Local Authority Designated Officer (LADO) is to coordinate all allegations and concerns made against a person who works with children.

The Team: This includes everyone involved in English Plus Guardianship including Owner, staff, short term contracted drivers and other staff, hosts, volunteers, and students on work placements.

The Owner: Kath Milburn

School: The school the child ordinarily attends in the UK

Student: Student for whom we have been appointed Guardian by their parents as per our Parents Agreement. They may be a Child or a person over 18 who is still in full-time education.

Child / Children: Everyone under the age of 18

Parent: Parents of Students for whom we have been appointed Guardians

Harm: ill treatment including sexual abuse, neglect, [emotional abuse](#) and [psychological abuse](#). It also includes any damage to the mental or physical health brought about by seeing or hearing another person suffer – as in the case of domestic abuse. Harm may also come from any impairment to development.

Significant harm: Abuse or mistreatment that is likely to have a long – term effect either physically or mentally or both.

General wellbeing: ‘how a child is going’ in terms of having positive physical and mental health. An example might be difficulty understanding maths or having a cold. These things might be upsetting for a child but are unlikely to cause long-term harm in isolation. This may also include isolated concerns such as changes in eating habits, unhealthy use of online sites, homesickness, mental health concerns etc.

Purpose of this Policy

This policy applies to all members of the Team. The aim of the policy is to:

- Demonstrate our commitment to safeguarding procedures aimed at promoting child wellbeing and safety
- Outline how we protect the children and young people who are involved with English Plus Guardianship
- Provide Team members, Schools, Students and Parents with the principles that guide our approach to safeguarding
- Outline how we ensure all members of the Team understand these commitments and know how to deal with any concerns
- Outline how the Team respond to any concerns

Scope of the Policy

This policy applies directly to all members of the English Plus Guardianship Team and Guardianship Students

The principles of this policy apply to all children we (the Team) may encounter whether they are directly involved with English Plus Guardianship or not

Relevant Legislation

Social Services and Well-being (Wales) Act 2014

‘Social Services and Well-being (Wales) Act 2014 Working Together to Safeguard People Volume 1 – Introduction and Overview’

Children Act 1989 (particularly Section 47)

United Nations Convention on the Rights of the Child 1989

Children Act 2004

Counter Terrorism Security Act 2015

Keeping children safe in education 2024 (Statutory guidance)

Supporting Documents

This policy should be read alongside our organizational policies and guidance including:

- Student, Host and Parent Handbooks
- Parent and Host Agreements
- Host Induction and Recruitment Process
- Role Descriptions
- Travel and Transfers Policy
- Safer Recruitment Policy
- Whistleblowing Policy
- Emergency Procedures
- Team Code of Conduct
- Prevent (Anti-Radicalization) Policy
- Missing Student Policy
- Low-level Concern Policy
- Mental Health Policy

English Plus Guardianship will seek to keep children and young people safe by:

1. Adopting child protection and **safeguarding best practice** through our policies, procedures, and Codes of Conduct for all Team members
2. Building a culture of safeguarding where all Team members, Students and Parents treat each other with **respect and promote the wellbeing** of children and young people
3. Building a culture where all Team members, Student and Parents are **comfortable with sharing concerns** and know how and when to do so
4. Building **relationships of trust** with Students and involving them in Safeguarding where possible
5. Appointing a nominated **Child Protection Lead** for children and young people to coordinate concerns, report and liaise with outside agencies
6. Developing and implementing an **effective online safety policy** and related procedures
7. **Recruiting and selecting staff** and hosts using safe recruitment procedures, ensuring all necessary checks are made
8. Recognizing the importance of **correct recording and sharing of information** and to do so while keeping in line with legislation

1. Safeguarding Best Practice

Policies are subject to review annually and after any concern arises.

Policies are made and updated with reference to current legislation and advice from NSPCC, The Local Safeguarding Board, Children in Wales information, Wales Safeguarding Procedures and AEGIS guidance

2. Respect for Young People

- a. We have a Code of Conduct for all Team members and for Students
- b. The Code of Conduct is shared with all Team members during their induction and the main points are included in the Host Family Handbook, Parent Handbook and Student Handbook

3. Culture of Sharing Concerns

We ensure anyone who has contact with children puts the welfare of the child first. All Team members are aware of the problems to look out for, how to deal with those problems and have an easy and straightforward way of reporting them – as well as the support needed to do so All members of the Team:

- Are alert to the risks of harm which may happen to a child and are aware of the process by which such concerns are to be acted upon. We do this at the initial induction and all hosts receive Child Protection training which is updated every three years
- Have easy access to a DSL (Designated Safeguarding Lead) and have 24-hour contact information via phone, email or WhatsApp

- Understand that they must carry out their duties and responsibilities regarding safeguarding and child protection which are outlined in the Host Family Handbook and Agreement and in this document
- Have clear guidance on how to deal with a disclosure from a child.
- Feel safe and supported in reporting any concern, no matter how seemingly insignificant, without the fear of any retribution or negative effect. As outlined in the Host Family Handbook and Whistleblowing Policy
- Understand that they must not deal with an issue alone

Our Children and Young People

- Are given clear information on induction about what kind of concerns they can raise and how. They are given examples and told clearly that they can always tell us.
- Have a 24 What's App that they can use to contact us. They are told they can contact us at any time of day or night
- They are asked regularly about who they would turn to if they had a problem. This might be a teacher, boarding school staff or us. We make sure they are aware they can tell any trusted adult in school, or us.
- This information is contained in the Student Handbook.

More details below: Dealing with a Disclosure or Concern

4. Relationship of Trust with Young People

- a. Relationship Building and Professional Curiosity
- b. Clear Information
- c. Involving Students
- d. Having Clear Expectations
- e. Keeping Welfare Records

a. Relationship Building

The most important way in which we can ensure student safety and wellbeing is in our approach to that young person. All of us, including hosts and drivers, need to build relationships of trust and respect with young people to ensure open communication. All of us will build this relationship depending on the child and what works for them, by knowing the child and how they prefer to communication. In an organisational way, we do this by:

- Strong links with Schools and Parents, especially House Parents and Pastoral teams
- Regular informal visits to school where students have a space to voice any issues or just have a chat

- Being a listening ear for students and giving them to opportunity to give their opinions about what happens to them.
- Direct, easy communication lines with Students, in a format that works for them (WhatsApp, Messenger). 24-hour contact available.
- Showing an interest in their interests and activities and ensuring they have opportunities to pursue these interests outside of school where possible
- Making the Homestay experience a 'home from home'. We emphasise the importance of mealtimes and conversations with students. We do this in inductions, home visits and in the Host Family Handbook
- Sharing information with Hosts about Student hobbies and interests
- Where a student's concern does not involve of risk of harm, we will involve them in deciding what course of action to take and whether to tell School, Parents or others.
- Where there is a safeguarding concern, we will ensure the wishes and feelings of the child are taken into account when determining what actions to take and what services to be provided.
- Regularly ask for and listen to Student feedback. We do this with a written form, by asking students directly or by using the messaging apps as appropriate. All feedback is recorded in the Student Log and any concerns are dealt with by a Kath Milburn.

Feedback is asked for and recorded:

- At regular host family visits. Students staying with Hosts for the first time are visited after the first night of stay. We speak away from the hosts and make it clear that it is OK to say something positive or negative about the host if needed. Students are then visited regularly thereafter.

Professional Curiosity

A child may not be prepared to talk about any abuse, fears or difficulties. They may also not be aware that they are being abused. Team members need to be proactive in asking students about their experiences, showing an interest in their online activity and ensuring students feel comfortable to speak with them. At EPG the mental health of our international students is of great importance please refer to **The Mental Health Policy** for further information. We ask host families to ask students about their experience in school, for example, to highlight any issues students may be having and speak to the DSL if they have any concern about the student.

Clear Expectations

- Codes of Conduct are shared with Students, so they are aware of what is expected of them and of the adults around them.
- Relevant sections of The Bullying Policy and E safety Policy are shared in the Parents, Students and Hosts Handbooks
- Make it clear in Student Induction and Handbooks that they are also responsible for the Safeguarding of themselves and other Students.

Keeping Records

- We keep individual Student Logs to record any event involving the student. This could include concerns raised by school, parents, or their host. It covers mild illnesses, transport arrangements, communication with students, hosts and parents etc.
- We keep Logs and Child Protection records securely in digital form only and password protected

- For each Student, there is one central Log that Kath Milburn & Duty Cover always have access to.
- Hosts are also expected to keep logs of minor events while Students are staying with them. These logs may be kept on paper but in a secure location. The contents are shared with Kath Milburn weekly or sooner if there is a cause for concern.
- Students, Parents and Team members are aware that the safety of the student has precedence over data protection and that we would share student data, if necessary, to protect student safety. We make this clear in the relevant Handbooks.
- There is clear and regular communication between School, Parents and EPG. This is mainly through What's App groups. Personal information is shared where to not do so would be in the detriment of the student.
- Up to date records on Hosts and other Team members including DBS checks, Safeguarding training etc. These are kept on our online databases and are done in line with the Data Protection Policy.
- We will keep all child protection records confidential, allowing disclosure only to those who need the information to safeguard and promote the welfare of students. We will co-operate with the police and social services to ensure that all relevant information is shared for the purposes of child protection investigations.
- Child Protection Records are kept secure and separate from the usual Student Log. Such records include what actions were taken, when and by whom.

5. Designated Safeguarding Lead

Kath Milburn is the Designated Safeguarding Lead responsible for:

1. Acting upon all concerns raised concerning a child at risk of harm and of any circumstances which may be detrimental to their health and wellbeing, and support any other team members who may be involved
2. Ensuring that all members of the Team receive up to date and regular safeguarding training to members of the Team. This occurs during induction and every three years
3. Ensuring that all members of the Team, Students and Parents are aware of the English Plus Guardianship Safeguarding Policy and Code of Conduct
4. Ensuring that all members of the Team are aware of what to do in case of a disclosure or wish to report a concern
5. Creating a supportive environment for adults and children where they feel able to share information without fear or judgment
6. Promote a proactive approach to child protection and review policies after any incident and each year
7. Keeping personally updated with legislation and the guidance and policies of the North Wales Safeguarding Board
8. Keep records of any reported concerns and pass this information on to Parents, Schools, and any external bodies such as the police and social services where necessary
9. Liaising with DSL of schools attended by students
10. Referring cases to the Channel programme where there is a concern regarding radicalisation, and to the police where a criminal offence has been committed

6. Online Safety

- There is an E-Safety Policy which is included in this document
- Relevant sections are included in the Host Family and Student Handbooks
- Hosts are made aware of the need to monitor internet use and to engage with discussions on internet use with students. This is done at induction

7. Safer Recruitment

- Procedures for recruiting Homestay hosts is outlined in the document: Host Induction and Recruitment Process
- Partners have enhanced DBS checks for working with children which are updated every three years
- Drivers have enhanced DBS checks which are also updated. Drivers have had an induction and references checked as well as safeguarding training updated every three years. Drivers are recruited directly from our bank of hosts at English Plus because they have a track record of being reliable and responsible with young people.

8. Data Protection

English Plus Guardianship will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of the students. We will co-operate with police and social services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of the current edition of *Working together to safeguard children*.

Except in exceptional circumstances, we will always notify the school attended by the student of any concerns relating to a student's safety or welfare.

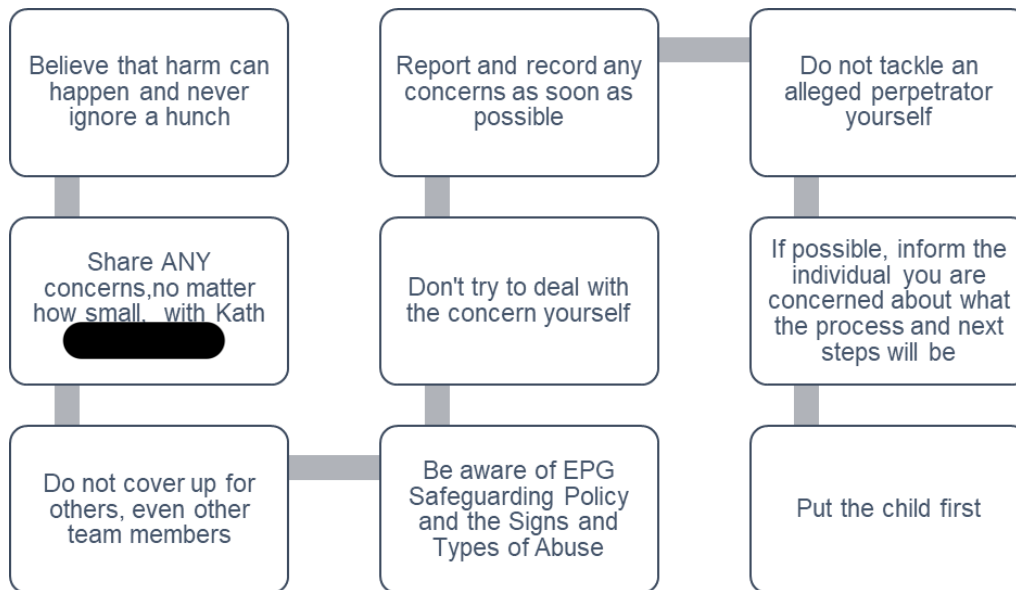
Essential records about hosts and Student Records are stored on securely which is always password protected and available to Kath Milburn and Duty Cover.

Student logs, concern forms and records of any incidents are all kept in cloud-based documents – also password protected and available to Kath Milburn and Duty Cover only at any time.

Additional records of hosts, such as interview notes, copies of ID etc are kept by Kath Milburn in paper versions in the Host folders which are in a lockable cabinet.

The pathway to deciding about what information to share is included in Figure 3: Sharing Information

Dealing with a Disclosure or Concern



Dealing with a Disclosure from a Student OR any Child

- Make sure of the child's immediate safety. For emergencies, refer to Emergency Procedures Policy.
- Reassure the child that what has happened is not their fault
- Listen carefully to the child and reassure them that they are doing the right thing by talking to you
- Do not show any judgement or disbelief
- Ask the Student if they agree with you sharing the information but make sure they understand that you may need to share this information with others
- Ask open, not leading, questions
- As soon as possible, write down the conversation. Use the child's own words as much as possible
- Where relevant, preserve any available evidence (for example, notes, mobile phones containing text messages, clothing)
- Explain to the Student what will happen next
See also *Figure 2. What to do with a Concern*

Pass the information to the DSL verbally initially and in writing as soon as possible. Complete the reporting form where this is practicable.

Further Guidance

Where the concern involves the DSL or where you do not think that the DSL would be the appropriate person to share with:

- Contact NSPCC Whistleblowing for advice
- Contact local Social Services or Safeguarding Board

Where a concern arises in other circumstances (for example from observations, from a parent, about abuse carried out by a student), the same reporting procedures must be carried out i.e. pass it on to DSL verbally and in writing.

After Reporting a Concern

- The person who reported the concern should continue to pass on information if it arises but not investigate further independently
- The person reporting the concern and the child will be updated on what happens within 3 days or sooner.
- The person who has heard the disclosure is made aware that further support is available for them to deal with the event.

Managing Concerns

The DSL will decide on the most appropriate course of action and whether the concerns should be referred to Children's Social Care. If it is decided to make a referral, then the Parent and/or school will be informed unless this would place the student at further risk. Options for intervention include:

- Managing any support with the School and Parents
- A referral for statutory services
- Allegations against team members, or any other adult

Records of actions taken will be recorded in the Child Protection Concern Log

Where a child is in immediate danger, the police and social services will be contacted by the DSL. This will be done immediately

Where the concern meets the local thresholds for reporting, the DSL will report as soon as possible to the local Social Services and within 24 hours. The threshold for reporting is that the child is suffering, or at risk of suffering significant harm.

Where there is a concern, but it is unclear whether this meets the threshold, the DSL will consult the local authority for advice without naming the child or other people involved. Where the concern does not meet the local safeguarding threshold but is nevertheless a concern about the student's wellbeing, English Plus Guardianship will manage support alongside, where possible, the Parents and School and in consultation with the student.

Where the concern involves a member of the Team or another Student in the following situations, but does not meet the threshold for reporting, the DSL will nevertheless investigate any concerns.

- Breaking the Code of Conduct
- Behaving in a way that is inappropriate around children
- Behaving in a way that is detrimental to a child's wellbeing, This will result in relevant

actions which may include:

- The involvement of the School or Parent

- A review of the Team member's position including termination of any agreements
- A review of Policies

On occasions where students are staying locally with host families, and are therefore the responsibility of English Plus Guardianship, the DSL will do all possible to always be locally available. In the event that the DSL is not available, Duty cover staff will deal immediately with any matters and take up concerns with the local authorities and / or the school DSL instead.

Protecting the Student

As far as possible, the student concerned will not be in contact with the person related to the reported concern, while any investigation is carried out, for example will go to a different host family

As far as possible, the student concerned should not have their daily activities, friendship groups or life disrupted because of voicing or being subject to a concern

The student should not feel singled out or treated differently because of raising or being subject to such concerns

Dealing with Allegations

Allegations Against Team Members

We aim to balance the need to protect students from abuse and the need to protect team members from false and unfounded allegations or misunderstandings.

Allegations that meet the threshold

This guidance should be followed where it is alleged that anyone working, volunteering or hosting students for EPG has:

- Behaved in a way that has harmed a student, or may have harmed a student and/or
- Possibly committed a criminal offence against or related to a student and/or he or she may pose a risk of harm to a student; and/or
- Behaved towards a student or students in a way that indicates that he or she may pose a risk of harm to a student; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with students (known as transferable risk)

In the event that there is an allegation against a member of staff, volunteer or homestay, EPG will follow the guidance in the most recent version of KCSIE.

Allegations against a member of EPG should be directed to the DSL Katherine Milburn. The DSL must contact the LADO immediately and follow their advice. They must not investigate themselves before contacting the LADO. If allegation is about DSL, please contact the LADO directly.

Where a team member is found to be unsuitable to work with children, a report will be given to the DBS, and this report will be completed by the DSL. This is true whether the team member resigns or is asked to no longer work with English Plus Guardianship.

After any serious incident resulting in informing the authorities and / or finding a team member unsuitable, a review of all safeguarding procedures will be carried out by the DSL.

Any historical allegations should be referred to the police, if they are made by an adult. If they are made by a student, they should be reported to the LADO.

Allegations Against Students (Child on child abuse)

Where a guardianship student for whom we have responsibility is accused of abuse against another student we will ensure the safety and welfare of both students. This may involve finding alternative accommodation as necessary to protect both students.

If it is necessary for the police to be involved and interviewed by the police for any reason, we will inform the student's school and parents as soon as possible and will agree on an appropriate adult to accompany that child.

If the child is suspended from the school during the investigation, we will provide accommodation and support as necessary.

These also apply if the accusation of abuse is against a student for whom we do not have responsibility.

Low-Level Concerns

A Low-Level Concern is any concern, no matter how small, even if it is just a 'nagging doubt', a sense of unease, that another adult or yourself, has acted in a way that falls short of EPG's Code of Conduct. EPG actively encourages hosts to self-report please see **Low-Level Concerns Policy** for more information.

Whistleblowing

English Plus Guardianship has a separate policy that outlines the whistleblowing procedures. These protect staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.

Liaison with NWSB and Schools

English Plus Guardianship will liaise with the North Wales Safeguarding Board and work in partnership with other agencies in line with *Working Together to Safeguard Children*.

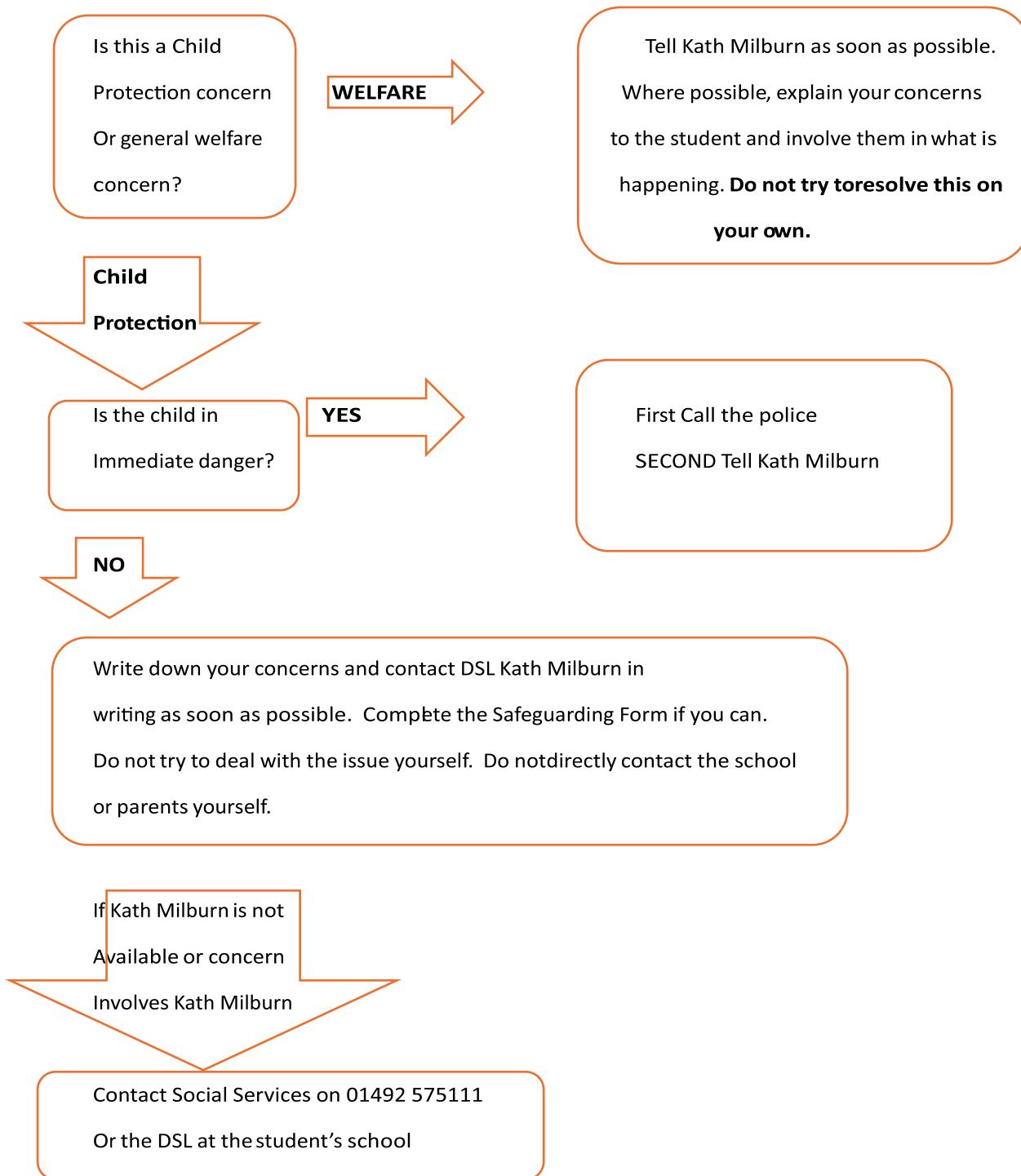
Partner schools have their own safeguarding policies. These can be found on their website. We only work with schools in North Wales and with homestays in North Wales. A student would not be accommodated outside of this area. However, if a concern arose while a student was outside of the NWSB area, English Plus Guardianship recognises that a different/additional LSP arrangement would be required as well. In this case, English Plus Guardianship will contact the relevant LSP and follow their procedures. Details can be found on the Local Authority website. The website below provides a link to all of the LSPs in the country:

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

In the event of any contact information difficulties then *English Plus Guardianship* should call the police as they are one of the partners.

The company is aware of how to access local agency contacts; this includes Local Safeguarding Partnerships across the country and how to access locally agreed inter-agency procedures and guidance. 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 dialling 999, this includes in Wales and Police Scotland.

The company is aware that in **Wales** for a non-emergency referral or concern they can contact the local child protection services. Their contact details can be found on the website for the local authority the child lives in, and on the table at the start of this document.



Child Protection Training

The DSL will attend suitable face-to-face Child Protection Training approved by the North Wales Safeguarding Board, AEGIS or NSPCC every 2 years

Kath Milburn is also responsible for recruitment, is trained in Safer Recruitment and Child Protection.

Hosts, drivers and staff receive Prevent Awareness Training and basic Safeguarding training to include information about signs and types of abuse, dealing with disclosures and an induction to our Code of Conduct and safeguarding policy. There is further information in the Homestay and Drivers Handbooks. This training is given every three years with updates given on host family visits which happen annually.

Hosts and Drivers receive information in their Handbooks and the content is also discussed during induction.

All staff, hosts and drivers must be familiar with Keeping children safe in education 2024 Part 1 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf

Types of Harm and Signs of Abuse

This information is a summary of the guidance given in Child Protection Training and Induction. It is only limited in scope and is meant to provide a general overview only.

There are many signs of types of abuse, but some indications are common:

Some common signs that there may be something concerning happening in a child's life include:

- Unexplained changes in behaviour or personality, for example becoming more aggressive, disruptive, withdrawn, or clingy, or might have difficulty sleeping
- Lacks social skills and has difficulty forming relationships
- Poor bond or relationship with a parent, efforts to avoid specific family members or friends without any obvious reason
- Knowledge of adult issues inappropriate for their age
- Running away or going missing
- Always choosing to wear clothes which cover their body/ not wanting to change clothes in front of others
- Children who talk about being left home alone, with inappropriate carers or strangers
- Parents who are dismissive or non-responsive to concerns raised
- Children who talk about running away and / or shy away from being touched, or flinch at sudden movements
- Concerning behaviour from adults who you know have children in their care, which makes you concerned for the child/children's safety and wellbeing.
- Emotional outbursts and find it hard to control their emotions

Just a hunch or a feeling something isn't right. It is important to act on your hunches!

Types of Abuse

Child Abuse including Sexual, Physical, Emotional Abuse and Neglect

Indicators of abuse and neglect¹

Abuse: a form 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 others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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.

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 from 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.

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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

¹ <https://www.gov.uk/government/publications/keeping-children-safe-in-education->
<https://gov.wales/sites/default/files/publications/2018-11/keeping-learners-safe-in-the-role-of-local-authorities-governingbodies-and-pprietors-of-independant-schools-under-the-education-act-2002.pdf>

Neglect: 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, for example, because 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 caregivers); or 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) is a type of sexual abuse. When a child or young person is exploited, they are given things, like gifts, drugs, money, status, and affection, in exchange for performing sexual activities. Children and young people are often tricked into believing they are in a loving and consensual relationship. This is called grooming. They may trust their abuser and not understand that they are being abused.

Children and young people can be trafficked into or within the UK to be sexually exploited. They are moved around the country and abused by being forced to take part in sexual activities, often with more than one person. Young people in gangs can also be sexually exploited.

Sometimes abusers use violence and intimidation to frighten or force a child or young person, making them feel as if they've no choice. They may lend them large sums of money they know can't be repaid or use financial abuse to control them.²

It is worth remembering that the age of consent is 16. This means that anyone under the age of 16 is deemed unable to agree to sexual acts of any kind.

Signs of Sexual exploitation include being secretive, having unexplained money or items, being frightened of some places or people, inappropriate sexual behaviour, older boyfriends or girlfriends, changes of mood, being 'absent' from home or school.

Approaches may be made online which is why we need to be aware of students' online activities.

Criminal Exploitation such as County Lines

This occurs where young people are coerced or pressured into carrying out illegal activities. Children may not consider that they are being pressured but they are still children being groomed and this is a safeguarding issue. Pressure may include violence or threats to tell / show images the child would not want shared.

² <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-exploitation/#signs>

Signs may include having more money or possessions with no explanation, being absent, erratic sleep using new slang terms, being aggressive, angry, or isolated and withdrawn, spending time online and being secretive about what they are doing.

For Child Criminal or Sexual Exploitation, the child may not be aware they are being exploited. There may also be a stigma around disclosure, or they may not want to lose the 'rewards' they are being given whether it is possessions or attention or being in a gang. A child is unlikely to disclose for many reasons, so detection relies on adults looking out for signs.

Female Genital Mutilation

FGM includes procedures that intentionally alter or injure the female genital organs for reasons that are non-medical. FGM is extremely harmful on the child both physically and mentally. It can occur at any age from birth onwards, though most cases occur between the age of 5-8.

FGM is illegal in many countries and in the UK, it is illegal even if performed outside of the country.

Things to look out for:

- It is possible that FGM may occur when an older female relative is visiting
- A girl may talk about a special procedure to 'make her a woman' or talk of FGM in general
- The girl may be taken out of the country for a prolonged period, especially at the start of the summer holidays
- A girl may have an older sister or cousin who has had the procedure

If **anyone** suspects FGM has occurred, they **must** act:

We need to support the girl and any other family members who may be at risk

FGM is a criminal offence so the incident must be reported to the police

Signs FGM may have occurred:

Difficulty or pain with urination, difficulty walking, sitting, or standing, reluctance to undergo normal medical treatment, a girl may talk of pain or discomfort between her legs *Radicalisation*

The government defines radicalisation as "the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups". These people are vulnerable and therefore at risk.

The process of radicalisation is different for each individual but will lead to involvement with groups or ideas which advocate violence to a political or ideological end. It can include religious extremism and far right groups. Such involvement can lead to significant harm to children and young people.

Prevent is the UK's counter terrorism strategy which involves protecting and supporting vulnerable people who are at risk of being 'drawn in'.

Some factors make some young people particularly vulnerable. See Appendix 2 The Factors which may Contribute to Vulnerability to Radicalisation

Any concerns around radicalisation can be referred to North Wales Police, here:

<https://www.northwales.police.uk/advice/advice-and-information/t/prevent/prevent/> Indicators include:

The use of inappropriate language, advocating extremist views, possession of extremist literature physically or online, changes in behaviour or appearance, advocating violent actions.

Domestic Violence

A child is at risk of significant harm where they live in a home where domestic violence occurs. This includes psychological or financial abuse towards other adults in the home. It also includes 'honour based' violence.

Children can be at risk of direct harm or at risk of harm through being in a toxic environment. Such environments might be those with a high level of substance misuse, domestic violence, where a parent is incarcerated or where there is mental illness.

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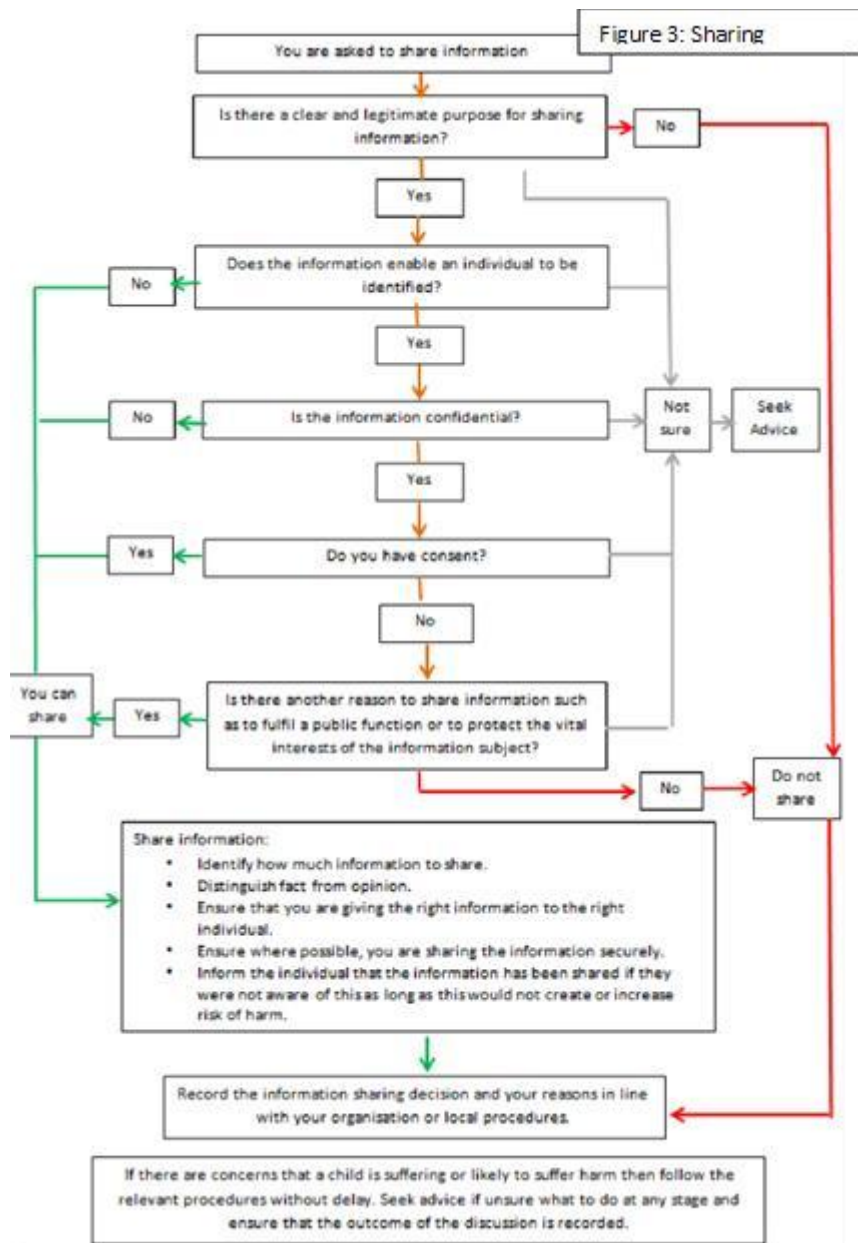
Child-on-Child Abuse

Although we often think of abuse being perpetrated by adults to children, it can also occur in the form of child-to-child abuse. Such examples include:

- bullying (including cyberbullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence, such as rape, assault by penetration and sexual assault.
- sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- harassment by sharing images without the person's consent, or threatening to do this
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.
- Abuse within relationships, also known as Teenage Relationship Abuse

Any of the occurrences above must be reported to the DSL Kath Milburn who will liaise with the Students' School about the matter.

It is important that all Team members challenge any such behaviour to prevent encouraging a culture where such abuse is tolerated.



The Factors which may Contribute to Vulnerability to Radicalisation

The University of Sheffield, Student Support Services

<https://www.sheffield.ac.uk/ss/safeguarding-overview/prevent/radicalisation>



Anti-Bullying Policy

This policy is written with reference to the policy of St David's School Policy

What is Bullying

Bullying is behaviour that is

- Deliberate and hurtful
- Repeated
- Occurs where the person affected finds it difficult to defend themselves (physically or verbally)
- Is often aimed at certain groups
- Can happen face to face or online

Cyberbullying includes:

- Emailing or texting threatening or nasty messages to people,
- Posting an embarrassing or humiliating video or photo of someone
- Repeatedly sending you messages you don't want

Prevention

We can help to prevent bullying by:

- Bullies often target a person who is different or 'other'. We can watch how we behave, set a good example and create an atmosphere where students feel welcome and accepted:

Safeguarding and Child Protection Policy

- Don't comment to students about another person's habits or features
- Try not to focus on characteristics of a student that might make them stand out – focus on the person
- Don't slip into stereotypes about culture and gender. Try to treat all students the same and recognize what we have in common
- Challenging behaviour which involves students being unkind or hurtful of another student, even if it may seem trivial
- Encouraging resilience among young people so that they can deal with bullying
- Gaining the trust of our students and making sure that we demonstrate that we are 'on their side'. We must develop a safe and caring environment in which students feel comfortable approaching us if they are having any difficulties

Dealing with Bullying

All staff and homestays have a duty to look out for any signs of bullying and to take appropriate action to stop this.

This applies no matter where the bullying takes place.

If the bullying takes place in school, hosts can still tell English Plus Guardianship who will deal with the issue.

It is also our responsibility to act on bullying even when it does not involve one of our guardian students. We must set an example to students that any type of bullying is not tolerated.

Guidelines for Student

In the Student Handbook, we tell students to:

- Tell someone (school staff, English Plus Guardianship staff, host, mentor student or parent) if they are a victim or bullying or if they suspect any other student is being bullied. This applies no matter where the bullying occurs.
- Get away from the situation as quickly as possible including blocking and unfollowing people on social media.
- Follow the following instructions if they are being bullied:
- Report on what happened to any member of school staff
- Use social media responsibly and not spread rumours or gossip
- Keep a record of any bullying including keeping screen shots if this is on social media
- Clearly and calmly tell the bully how their behaviour makes them feel, in writing if necessary

Hosts / Guardians

Look out for signs of bullying

- Examples of signs that a student is being bullied:
- Becoming withdrawn
- Not wanting to go to particular places / school
- Changes in eating, behaviour or sleep patterns

What if a student tells you they are being bullied?

Safeguarding and Child
Protection Policy

- Praise them for telling you
- Make sure the students understand that it is not their fault
- Reassure them that things can and will get better
- Try to ask for details and make notes as soon as possible • Discuss with them the options that are available:
- If it involves school:
- English Plus Guardianship can speak to staff on their behalf or
- They can talk to whichever staff member or mentor they feel most comfortable talking to

Talk about strategies for dealing with the bully in the meantime:

- Block on social media
- Is it possible to avoid the person?
- Make it clear to the person how the bully is affecting them, either in person or in writing

Spend time with other friends who are more supportive

- Report on the matter, no matter how seemingly small, to DSL Kath Milburn. **How reported incidents of bullying will be dealt with**
- The incident will be recorded in the Child Protection Concern Log by the DSL
- Where schools are involved, the relevant DSL will be informed

Cyberbullying or Online Risks

- If the bullying is online, the way this is dealt with will depend on whether the perpetrator is a fellow-student. If so, this will be referred to school
- Any online bullying will be reported to the platform concerned where this is possible. More information on how to do this here <https://reportharmfulcontent.com/>
- Where bullying or behaviour is threatening or abusive, or involves exploitation, this will be reported to the police and / or the local authority in line with general safeguarding policies where grooming or exploitation is suspected.
- As with all forms of bullying, the approach will be to support the student, help them find strategies to avoid harmful messaging and encourage them to talk about how they are feeling.
- It may also be helpful to help the student understand why people carry out bullying behaviour and to help them understand that the behaviour is not related to them.
- Ensure the student knows how to change their privacy settings and to protect themselves online.

How English Plus deals with bullying between students

Bullying will not be tolerated

Procedures for dealing with any reports of bullying between students will depend on the severity but in all cases will involve:

Initially

- Talking to the students concerned individually
- Talking to any other students or hosts who might have been witnesses
- A temporary separation of the students involved to ensure no further distress

Secondly

- Opportunities for the bully to redress the situation
- Careful discussion with the person bullied about what happens next
- Informing parents
- A discussion with school about what will happen next and any school sanctions
- Ongoing support and follow-up for the student being bullied
- During the half term or longer holidays, there will be sanctions which may include:
 - Removal of mobile phone
 - Removal of free time

E-Safety Policy and Guidance

This policy outlines the steps we have in place to ensure that members of the English Plus Guardianship team and our students stay safe online.

See also

- Data Protection Policy
- Anti-Bullying Policy

Policy Principles

1. Consistency. We work closely with our partner schools to give our students a consistent message on how to stay safe online. Our students and hosts receive the same SAFE message that is used in school.
2. Communication. We follow an approach of consistent communication with students. It is better to have clear communication and to encourage a supportive environment in which students can talk about their concerns. It is important for all Team members to be curious about students' online activity. We also encourage all hosts to inform us of any concerns, no matter how small.

3. Information and Training. Guidance to hosts is provided in the Host Family Handbook with links to further information. We discuss the importance of online safety at Host Family Induction, and it forms part of the Child Protection training.
4. Social Media. Our policy is that hosts do not communicate with students using online platforms. We also advise hosts and other English Plus Guardianship team members to limit access to their social media profiles.
5. Internet Usage and Limits. We recognize that internet usage is important for students but, for their own wellbeing:
 - Internet use may be restricted at night
 - Hosts encourage students to take breaks and to do activities such as going for a walk, playing card games.
 - Hosts will tell English Plus Guardianship if there is a concern about too much screen time. We will then discuss this with the student, parents and school and agree on a suitable timetable for internet use.
6. Safeguarding. We will withdraw online access to students where there is an immediate safeguarding concern, for example online abuse. This would be done in discussion with students, parents and school.
7. Cyberbullying. We do not tolerate any bullying, including cyberbullying. Any student found to be bullying or causing offence or abusing others online will be reported to school, parents and the police where relevant.

Risks associated with online activities can be categorised as the Four Cs

Content: being exposed to illegal, inappropriate content, for example extremism, self-harm, fake news

Contact: harmful online interaction with others, for example grooming, commercial advertising

Conduct: online behaviour that increases the likelihood of harm, for example sending or receiving explicit images

Commerce: risks such as online gambling, phishing

E-Safety Guidance for English Plus Team Members

The online world that young people and children inhabit can seem like a strange place. It may seem as though young people are unduly obsessed with their phones and the online world. For young people, the online world is a very real and important part of their life. The online world enables our students to learn, be creative and communicate in amazing ways. Just like in the real world, though, we also need to take steps to make sure our students are safe online.

Definitions

Online: Any communication, apps, programmes or use of devices that involve the use of the internet. This includes but is not limited to social media, games, streaming services and apps.

What are the areas of risk for children and young people?

1. **Sharing too much information**
Sharing information that would particularly identify them. For example, sharing their age and location with people they don't know.
2. **Seeing inappropriate content**

Being exposed to illegal, harmful or explicit content. For example, being exposed to sexual images of other young people or to sites which promote self-harm.

3. **Contact**

We wouldn't want our young people to go anywhere they like and speak to just anyone in the real world because we know it could be unsafe. The same applies online.

Adults can use the internet to gain access to young people; for example, via gaming platforms, social media and chatting apps. Young people might also be exposed to harmful contact such as sexting or cyberbullying, either from adults or from other young people.

4. **Commercialism**

There are often hidden costs in games or apps aimed at young people. It is easy to become involved and agree to payments without being fully aware of the consequences.

5. **Overuse.**

Over-reliance on online activities can lead to young people missing out on other activities and adversely affect their wellbeing.

How can we protect young people?

Be Familiar

We can help students by making sure we are aware of:

1. The latest games, apps and devices that our students are using
2. The law and how it relates to abuse and consent online

NB This doesn't mean being an expert on every app and games console but just to show an interest. One great way to learn about apps and games is to ask students themselves.

Sources of Information

A good place to start finding out about what young people are doing online <https://www.net-aware.org.uk/>

Lots of guides on different apps and social media, including the dangers to young people: <https://www.whoishostingthis.com/resources/e-safety/> NSPCC on keeping young people safe online

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/>

Show an interest

It is important to show an interest in what students are doing online. We can do this in the same way as we might ask about their home country or what they do at home.

Ask about what games they are playing, what apps they are using and who they are chatting too online. Do this in a friendly, interested way rather than in a way of 'checking up on them'. Young people need their privacy to.

Be a listening ear

As in other areas, make sure that you are there to listen and that students know they can come to you with a problem. It is important not to judge but for students to feel that they can tell you anything that is bothering them.

Pay attention if students seem concerned about messages from ‘friends’. Who are they talking with when gaming? Are students telling you about extreme ideas or conspiracy theories without questioning them?

Be responsible online ourselves

- Follow the same SMART guidance as students
- Do not befriend or follow a student on social media
- Be careful of your permissions. You may not want students to be able to see everything you share on social media
- Check your own home settings. Make sure you have blocked adult content on your own home Wi-Fi.



We can reinforce this by talking with students about how to stay safe.

Questions for discussion might be:

- What information do you have in school about staying safe online?
- Do you use any of the advice from school?
- Have you ever seen anything you wish you hadn't?
- How much time do you think is safe for you to spend online?
- Who do you play games online with?
- What apps or sites or games do you like?
- What would you do if you saw someone being nasty to another person online?

Talk to students about our own responsibilities

To keep social media safe and welcoming, we all need to play our part. Students can help by reporting any abuse directed at other; by not ignoring cyberbullying but by supporting others who are being bullied or shamed online.

Talk about what to do if

- they have any concerns
- they feel bullied or picked on online
- someone is asking for pictures or sending messages that make them feel uncomfortable
- they see something online that makes them feel uncomfortable they are spending too much time online or spending too much money online NB On the image above, Click CEOP refers to the police Child Exploitation and Online Protection command. Students can report concerns about online abuse here <https://www.ceop.police.uk/safety-centre/>

Consent, Sexting and the Law

Sexting

Sexting is when someone sends or receives a sexually explicit image, video or text. It can include sexual chat and requests for images of a sexual nature.

What is Illegal?

It is illegal to take, possess, or share images of an abuse or indecent image of anyone under the age of 18. This includes:

- If that person has agreed to the image
- If this has been taken by someone else under 18
- If a person under 18 is sharing an image of themselves.

Depending on the content, it may also be illegal to share sexually explicit chat or text. **This is particularly, true if:**

1. The person texting is over 18 OR
2. The person texting is under 18 but is inciting the other person to share indecent images or engage in sexual activity.

How to report a problem on a site / platform

If you are unfamiliar with a particular platform/site – use a search engine and insert key words into an online search, e.g.: “how to report comments/content on”

- Follow the steps outlined in the instructions
- Contact Net safe 0508 638 7233 if you have any questions or problems with reporting content

What to do if:

1. **You receive or see an indecent image of a young person (under 18).**
DO NOT share the image with **anyone**. By doing so, you yourself will be breaking the law. You can take a screenshot if necessary but report it to English Plus Guardianship as soon as possible. We will take it up with the provider where necessary or with school.
2. **You are concerned that the student is spending too much time online**
 - Talk with the students about this and about why it is important to have time away from screens

- Keep to the agreed time of 10pm to go to bed and if necessary, turn off internet access at that time
 - Talk to English Plus Guardianship about your concerns. We may need to discuss this with the student and their parents and / or school
 - Where this is a safeguarding issue and the use of phone or other device is causing harm to the student, we may withdraw access
 - Make sure they have breaks from screen to do other activities such as playing a game, going for a walk. It is important to have spaces where screens are not allowed. There should be no screens at mealtimes.
3. **You have reasons to believe that the student is being bullied or is bullying another person online**
You must report this to Kath Milburn, DSL.

Useful Resources for Safeguarding

[Stop it Now! Information about sexual abuse especially online](#)

<https://www.stopitnow.org.uk/resources.htm> [Sexual Abuse among children Info leaflet](#)

https://www.stopitnow.org.uk/files/stop_booklets_childs_play_preventing_abuse_among_children_and_young_people01_14.pdf

[Leaflet about sexual abuse online and safe internet use](#)

https://www.stopitnow.org.uk/files/stop_booklets_the_internet_and_children_whats_the_proble01_14.pdf

[How to help protect children from online sexual abuse](#)

https://www.stopitnow.org.uk/files/pp_child_sexual_exploitation_leaflet_01_14.pdf

[Met Police Information on What is Terrorism and Extremism](#)

https://safe.met.police.uk/terrorist_or_extremist_activity/get_the_facts.html

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Next update	11/2/2026	

