

Safeguarding and Child Protection Policy

SAFEGUARDING AND CHILD PROTECTION POLICY

This safeguarding policy demonstrates the commitment by Belgravia to deliver a duty of care to students, host families, parents and Belgravia staff. The document summarises current working practices incorporating Child Safeguarding & Child Protection, Whistleblowing, Welfare, Health & Safety, Confidentiality & Data Protection and use of IT & internet.

The following documents should be read in conjunction with this policy which comply with guidelines given by AEGIS accreditation:

Staff Code of Conduct and Declaration; Absent or Missing Child Policy and Procedures, Complaints Policy and Whistleblowing Policy.

Belgravia aims to promote the safeguarding and welfare of students by providing a framework to ensure all young people under the guardianship are protected at all times. We reference, monitor and develop our Safeguarding and Child Protection policies, procedures and statements with guidelines from the Children Act 1989, Children Act 2004, Data Protection Act 2018 and AEGIS guardianship accrediting body. Other references and guidance are taken from:

- Keeping Children Safe in Education, (2024)
- Working Together to Safeguard Children, (2023)
- National Minimum Standards for Boarding Schools (2022)

This policy applies to all full-time, part-time, contracted, agency and volunteer staff and all those who provide homestay accommodation.

The aim of the policy is to:

- Demonstrate our commitment to safeguarding procedures to promote child wellbeing and safety;
- Comply with UK Child Protection Laws;
- Provide a secure environment for a young person's development and learning;
- Bring awareness to a young person's physical, emotional and social wellbeing and provide procedures for intervention;
- Provide policy and procedures to follow in the event that a child safeguarding concern or issue is identified;
- Ensure confidentiality of all documentation and secure data;
- Promote a safer recruitment procedure;
- Review annually and update policy in response to regulation changes.

Safeguarding

Belgravia is committed to ensuring the safety and welfare of all young people under its guardianship. We expect all staff, hosts, transport providers and volunteers to recognise and share this commitment. All children, regardless of age, disability, gender, ethnicity, religious belief, or sexual orientation have a right to equal protection (the legal definition of a child is anyone under the age of 18). We expect these principles to be applied to young people who are aged 18 and over for whom we are responsible.

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We value, respect and listen to children and young people. We aim to promote trust, openness and clear communication between parents, students, schools, staff and homestays. We will actively work to identify welfare concerns and indicators of possible abuse or neglect at an early stage. We will act where we suspect abuse and neglect and take all and every appropriate action to protect the child or young person.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- 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; and
- taking action to enable all children to have the best outcomes.

Designated Safeguarding Lead Caroline Drewett; Email: caroline@bg-london.com; Tel: +44 7724 201 894. Contactable 24/7, 365 days of the year.

DSL has Safeguarding Children Qualifications and Child Protection Training.

The DSL is also responsible for anti-radicalisation and Prevent. More information on this can be found in the Anti-radicalisation Policy in Appendix 5.

Safeguarding Policy & Key Principles

Belgravia recognises that child safeguarding is a multi-agency proactive process focused on protecting children at risk of harm or abuse. We are committed to referring any concerns via the Designated Safeguarding Lead (DSL) to the appropriate organisations, normally local authority children's social care, contributing to the assessment of a child's needs and, where appropriate, to assist in ongoing action to meet those needs to ensure children are adequately protected. In rare cases when serious abuse is suspected and immediate safety may be in jeopardy, the DSL must be informed immediately and he will contact police and social services urgently.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- 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;
- and taking action to enable all children to have the best outcomes.

Put simply safeguarding is:

- Child protection
- Supporting vulnerable children
- Safe care, at home, in school and in the community
- Taking action

Safeguarding is most successful when all aspects are integrated together. Three key elements include a clear safeguarding ethos, a policy that sets out clear expectations and processes, and high-quality training that ensures staff know what to do and do it consistently throughout Belgravia.

Other key aspects of safeguarding include:

- Ethos
- Policy
- Continuing Professional Development (CPD)
- Safer Recruitment
- Safer Perimeter
- Community
- Beyond Community
- Risk
- Curriculum
- Partnership
- Transition Planning
- Monitoring and Evaluation

Belgravia recognises that there are many forms of child abuse and ways that a child may be at risk.

In a broad sense, child abuse is defined as any act of commission or omission that endangers or impairs the physical/psychological health and development of an individual under the age of 18. Such an act is judged on the basis of a combination of community standards and professional expertise. It is committed by individuals, singly or collectively, who by their characteristics (e.g. age, status, knowledge, organisational form) are in a position of differential power that renders a child vulnerable. Child abuse is not limited to a child-parent/guardian situation, but includes anyone who is entrusted with the care and control of a child, such as child-minders, relatives, teacher, etc. For child sexual abuse, acts may also be committed by strangers to the child.

The main definitions of abuse are:

All staff should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not

limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.

Indicators of abuse and neglect

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. 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 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. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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, 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 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.

Safeguarding issues.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos. 8 can be signs that children are at risk.

Below are some safeguarding issues all staff should be aware of. Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex B.

Child-on-child abuse. All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Child-on-child abuse. is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)

- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse) •
- sexual violence such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment^{9F 10} such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos¹¹ (also known as sexting or youth produced sexual imagery)
- upskirting¹² which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Zero Tolerance Approach: Belgravia has a zero-tolerance stance towards child-on-child abuse and recognizes that it may occur in all settings, including guardianship environments.

Identification and Reporting: All staff are trained to recognize the signs of child-on-child abuse and are required to report concerns to the Designated Safeguarding Lead (DSL).

Victim-Centered Support: Belgravia ensures that victims are listened to, supported emotionally, and protected from further harm. This includes creating a safe environment where they feel confident to disclose concerns.

Managing Allegations: Allegations will be investigated thoroughly, with both the victim's and alleged perpetrator's needs considered. Where necessary, external agencies such as children’s social care or the police will be engaged.

Preventative Measures: Belgravia promotes a culture of mutual respect through education on acceptable behavior, addressing harmful attitudes early, and encouraging reporting of concerns.

Restorative Practices: Where appropriate, restorative approaches will be used to resolve disputes and repair harm caused by incidents.

Child criminal exploitation (CCE) and child sexual exploitation (CSE)

Both CCE and CSE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. It may involve an exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CCE and CSE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Child criminal exploitation (CCE)¹³

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child sexual exploitation (CSE). CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

Domestic abuse. Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or

experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Female genital mutilation (FGM) Whilst all staff should speak to the designated safeguarding lead (or a deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. 14 If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Mental health All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken to follow their school or college's child protection policy and by speaking to the designated safeguarding lead or a deputy

Supporting International Students with Mental Health Concerns

Belgravia is committed to providing comprehensive support to international students presenting mental health issues. Recognising the unique challenges faced by students in unfamiliar environments, the following measures are implemented:

Early Identification and Intervention

Regular monitoring of students' well-being through communication with schools, host families, and students themselves.

Providing training for staff and host families to recognise signs of mental health concerns and respond appropriately.

Access to Professional Support

Assisting students in accessing mental health services, including school counselors, local therapists, or other healthcare professionals.

Liaising with the student's family, school, and health practitioners to ensure coordinated support.

Emergency Protocols

In cases where immediate risks to the student's safety are identified, the organisation will implement a crisis response plan, which may involve:

Referring the student to specialist mental health services.

Contacting emergency services if necessary.

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Removal from School

If it is deemed that the school environment exacerbates the student's mental health challenges, the organisation will work collaboratively with the school, family, and relevant professionals to arrange the student's removal.

Alternative arrangements may include enrolment in a different educational institution or a temporary pause in formal education while focusing on the student's recovery.

Clear communication with the student's family will be maintained to ensure they are fully informed and involved in decision-making.

Ongoing Support

After removal, Belgravia will continue to support the student by:

Coordinating mental health care.

Offering pastoral support through host families or alternative guardianship arrangements.

Facilitating the student's reintegration into education when ready.

This approach ensures that the student's mental health is prioritised while balancing their educational and personal needs. All actions will be in line with safeguarding principles and involve consultation with parents, mental health professionals, and schools.

Serious violence All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational performance, signs of selfharm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with.

Allegations Against Staff or Homestay Hosts

Belgravia takes all allegations of abuse against staff or homestay hosts seriously. In the event of such allegations, the procedures outlined in the Emergency Procedures Policy will be followed to ensure a prompt, fair, and thorough response.

Key steps include: Immediate Reporting:

All concerns or allegations must be reported immediately to the Designated Safeguarding Lead (DSL).

Engagement with Authorities:

The DSL will notify the Local Authority Designated Officer (LADO) and work in partnership to manage the allegation, ensuring compliance with statutory requirements and guidance from Keeping Children Safe in Education (2024).

Support for All Parties:

Belgravia will ensure support is provided to both the individual making the allegation and the accused, balancing the need for transparency, confidentiality, and fairness.

Suspension and Investigation:

If necessary, the accused staff member or host may be suspended pending investigation. Host families may have hosting arrangements temporarily paused to prioritise child safety.

For detailed procedural steps, refer to the Emergency Procedures Policy

Low-Level Concerns

Belgravia is committed to fostering a culture of openness and accountability, where low-level concerns about the behaviour of staff, volunteers, or homestay hosts can be reported and addressed promptly. Low-level concerns are defined as behaviours that do not meet the threshold for allegations but may still be inconsistent with professional standards or the organisation's safeguarding ethos. Examples include inappropriate language, unprofessional conduct, or breaches of boundaries.

All staff and stakeholders are encouraged to report low-level concerns to the Designated Safeguarding Lead (DSL) or a senior manager without fear of reprisal. These concerns will be recorded, reviewed, and, where necessary, addressed through supervision, additional training, or other appropriate measures to ensure safeguarding standards are upheld. By addressing concerns at an early stage, the organisation aims to prevent behaviours from escalating and to maintain a safe environment for all children in its care.

This policy reflects guidance from Keeping Children Safe in Education (2024) and aligns with best practices for safeguarding in educational and guardianship settings.

Belgravia understands that Child Protection is an integral part of safeguarding and promoting children's welfare and that this protection stems from activities undertaken to protect children who are either suffering or at risk of suffering some form of abuse. We recognise that all staff and anyone connected with us have to work together to ensure that all children are protected from abuse and that their welfare is at the centre of everything we do. All members of staff will undertake a form of Safeguarding training to promote an awareness of the issues and need for a proactive safeguarding and child protection approach and culture. Staff and all people working with Belgravia (including homestays / host families) will feel empowered to raise concerns and report suspicions of child abuse or the risk that a child may be at risk.

The signs of child abuse aren't always obvious, and a child might not tell anyone what's happening to them. To that end, we ask all Belgravia members of staff and students to be aware of any potential symptoms of abuse amongst the students.

Some of the things to look out for:

- Acts out excessive violence with other children.
- Lacks social skills and has few if any friends.
- Significantly underweight but eats well when given food.

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- Reluctant to go to school.
- Is reluctant to get changed for sports etc.
- Wets or soils the bed.
- Drinks alcohol regularly from an early age.
- Is concerned for siblings or peers without explaining why.
- Becomes secretive and reluctant to share information.
- Talks of running away.
- Shows challenging/disruptive behaviour at school.

For more information on any definitions and topics mentioned above, please visit Part 1 (page 7) and Annex A (page 143) of the Keeping Children Safe in Education Government guidance.

https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf

Belgravia aims to provide a safe and secure environment for all students by liaising with parents, students, schools, homestays and transport providers.

For us to achieve this the following must be recognised, followed and/or in place:

- The Designated Safeguarding Lead has overall responsibility for the safeguarding and welfare of students
- Students have access to 24 hour support as explained in the student handbook
- Everyone in the organisation is made aware of the importance of welfare, safeguarding and child protection matters and must report any concerns to the DSL
- Student and homestay folders must be updated regularly
- Welfare and safeguarding issues could include allergies, illnesses such as asthma, mental health, changed demeanour in a student including weight gain / loss, bullying, cyber bullying and so on
- Child Protection includes abuse of a sexual, physical, emotional nature and neglect
- We have a responsibility to promote the welfare and safety of all children and young people.

Belgravia maintains a database of safeguarding contacts in each of the schools that it uses.

Any concerns should be raised immediately with the Designated Safeguarding Lead; Caroline Drewett Email: caroline@bg-london.com; Tel: +44 7724 201 894 If it is felt that a child is at immediate risk of significant harm, the police should be contacted on 999.

Belgravia will liaise with our Local Safeguarding Partnership (LSP) and work in partnership with other agencies in line with *Working Together to Safeguard Children (2023)*

The details of the Partnership for Belgravia are below:

Role	Name	Contact
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Belgravia Guardians Designated Safeguarding Lead UK Office	Caroline Drewett	+44 7724 201 894
Surrey Local Safeguarding Children Partnership Contacts	Surrey’s Local Authority Designated Officer (LADO)	0300 123 1650 LADO@surreycc.gov.uk
	Surrey Children’s Single Point of Access (C-SPA)	0300 470 9100
	UK Police (If you suspect a child is imminent danger)	999
	Clinical Commissioning Board	01483 405450

The following website provides details of all LSPs in the UK:
<https://childprotectionuk.co.uk/local-safeguarding-children-boards-for-england-and-wales>

Safer Staff Training

Belgravia recognises that a key way of safeguarding children from harm is to ensure the careful recruitment of those working with, hosting and transporting children. Belgravia set high standards of practice and recruitment processes by developing robust policies.

To that end, Belgravia follows a strict recruitment process of which further information can be found in the Safer Recruitment Policy.

Recruitment Process

During any recruitment process the Safer Recruitment Policy and procedures within must be adhered to.

Alignment - All persons applying to work with Belgravia subscribe to our mission statement and agree to how we will achieve this.

Advertising - When advertising for a role whether for staff, homestays or anyone connected with Belgravia in any capacity our commitment to safeguarding must be made clear and that the welfare and wellbeing of children is central to what we do. The DSL needs to review and vet all advertisements that are to be used for recruitment to ensure that our focus on safeguarding and child protection is suitably clear.

Advertisements - highlight where possible that applicants will be required to undertake an Enhanced Disclosure and Barring Service check.

DBS Checks - All guardianship staff and member homestays over sixteen who have contact with students will undertake Enhanced DBS checks with the Disclosure and Barring Service before being appointed. Authorisation from each individual is required in writing and is made clear on the application form. Belgravia will maintain a central system for holding and protecting all data. *Note* - An enhanced disclosure lists any criminal convictions including cautions. This may include ‘spent’ convictions and cautions that do not come under the DBS filtering rules introduced in 2013. It can include police information on someone which did not result in a conviction but which the police choose to pass on due to the information being of relevance to the safeguarding of a child. All DBS

checks on all staff and homestays should be renewed every three years.

All staff members will be required to sign an agreement for Belgravia to undertake an Enhanced DBS check including all children at homestays over the age of sixteen. On the application forms basic details will be required and a minimum of two references which should include one professional and one personal/character. These referees should be able to provide insight and a further data point as to the appropriateness of the individual for the role and to be working with children. All referees will be contacted directly by Belgravia and all references will be collected by us. Any general references will not be accepted. Where a telephone reference is obtained then a record of that conversation, who, date time and content of the reference should be logged on the Belgravia reference form. All applications will be checked and any errors and omissions noted referred back to the candidate for rectification. Any gaps in employment or anything that gives cause for concern such as long-term unexplained absences should be noted for use later at interview stage.

In addition, all staff members will be required to provide evidence of their identity, qualifications and right to work in the UK. If a member of staff possesses a DBS check, will permit their transferable DBS to be checked by Belgravia and are responsible for providing accurate information for a check to be carried out. These checks will need to be completed at the 'house visit' and conducted by a Belgravia member of staff that has safer recruitment training. At the end of the interview a self-declaration and medical declaration will need to be signed.

Belgravia encourages staff to be responsible for conducting themselves in a professional manner at all times, treat all colleagues and students with respect at all times, attend relevant training and keep up to speed with all changes in Safeguarding and Child Protection procedures.

Complaints and Allegations

This policy addresses all staff, parents, students, homestays, transport providers and volunteers. All staff, homestays, transport providers, parents, students and schools used by Belgravia must acknowledge their individual responsibility to bring matters of unacceptable practice, performance or behaviour to the attention of Belgravia and its management in a timely manner. Belgravia recognises that there may be legitimate concerns from students, parents, agents, host families or transfer companies and as an organisation we encourage these concerns to be met with a resolution in order to improve our service. Complaints are to be submitted in writing to: Caroline Drewett, email: caroline@bg-london.com (see appendix 2).

Whistleblowing

Belgravia has adopted a policy on "whistleblowing" to enable members of staff and hosts to raise concerns internally and confidentially about child protection, fraud, malpractice, health and safety, criminal offences, miscarriages of justice, and failure to comply with legal obligations or unethical conduct. The policy also provides, if necessary, for such concerns to be raised outside Belgravia's internal organisation.

Data Protection

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 1998 and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed irrespective of

whether it is held in paper files or electronically.

All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines.

Data Protection Principles

The Data Protection Act 1998 establishes eight enforceable principles that must be adhered to at all times:

1. Personal data shall be processed fairly and lawfully
2. Personal data shall be obtained only for one or more specified and lawful purposes
3. Personal data shall be adequate, relevant and not excessive
4. Personal data shall be accurate and where necessary, kept up to date
5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998
7. Personal data shall be kept secure i.e. protected by an appropriate degree of security
8. Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection

Belgravia will keep any records in a locked cabinet in the main office that only the Managing Director and the DSL has access to. Belgravia will only share records with those who have a legitimate professional need to see them and confidential information should never be used casually in conversation. In circumstances where the child's identity does not need to be disclosed the information should be used anonymously. In circumstances which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities.

E-Safety & Abuse

With the ever-growing use of the internet, mobile telephones and social media, children can be bullied, harassed or even groomed and subsequently abused. Belgravia will liaise with its partner schools to reassure itself that children are advised on safe use of the internet. Photographs of children and young people need their permission and further use of images in any form requires their permission. Belgravia will provide guidance for homestays and explain signs to look for in a child who is worried, such as a major change in demeanour, displays of anxiety or sleeplessness.

Safeguard Training

All Belgravia Staff, Volunteers and Homestay Hosts must complete appropriate safeguard training which needs to be renewed every three years.

Child Protection Training: <https://aegisuk.net/aegis-homestay-safeguarding-training-for-non-members/>

Prevent Training: <https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>

On completion of both courses, we ask staff to send their certificates to Belgravia via email: info@bg-london.com

Belgravia will keep a record of all appropriate safeguard training already undertaken.

All homestays will receive training from the DSL annually ahead of each academic year to ensure each homestay host is updated accordingly.

Procedures for Reporting Concerns

Staff could have suspicions or concerns raised in a number of ways, the most likely of which are:

1. The conduct of a member of staff;
2. A child, parent or member of staff “disclosing” abuse;
3. Bruising or evidence of physical hurt; which may or may not be accompanied by;
4. Unusual behaviours by a child.

If a member of staff has such concerns they should be reported to the DSL immediately and confirmed in writing within 24 hours, using the ‘Belgravia Safeguarding Concern’ form).

Delay could prejudice the welfare of a child. If the concerns relate to the conduct of a member of staff, these also should be reported directly to the Managing Director; there is an obvious need to act immediately and with utmost discretion.

The DSL or Managing Director will consider the report and either refer this immediately (and certainly within 24 hours) to the relevant authorities or, after taking appropriate advice (which may include discussing the circumstances on a confidential basis with the Social Welfare Department or the Police) decide not to refer the concerns to the authorities but keep a full record of the concerns in a secure locked cabinet.

Belgravia is committed to ensuring that where a safeguarding concern arises, the child’s wishes and feelings are actively sought, considered, and respected. This will be achieved through age-appropriate communication, offering them a safe and supportive space to express themselves. Staff will take their views into account when making decisions, while balancing these with professional judgment and the need to ensure their safety and welfare. All interactions will be conducted sensitively and documented appropriately to reflect the child's perspective.

Procedure for Children Disclosures

The following information is intended to assist if you become involved in a potential child protection situation when a child or young person makes a disclosure.

Note: this is a completely different procedure to interviewing pupils on disciplinary issues.

- Listen, and allow the pupil to finish without directly questioning or stopping them. Let them tell you what they want to and no more. They may need to disclose to a specialist later and too much detail now may interfere with later investigations.
- When the interview has finished, make sure the pupil feels secure and explain what you are going to do next.
- Write down notes, including date and time of the interview and sign the notes. Record as much as you can remember as soon as possible (preferably immediately) afterwards, using the pupil’s own words, on the ‘Belgravia Safeguarding Concern’ form (Appendix 6).

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- Stay calm and convey this through word and action; reassure the pupil that you are taking what they have to say seriously.
- Report to the DSL or Managing Director and provide the written record of the incident (on the 'Belgravia Safeguarding Concern' form) the same working day.

Confidentiality

The management of confidentiality is an essential factor in all issues relating to Child Protection.

Staff should **never** give pupils or adults an absolute guarantee of confidentiality, but must ensure that the information is disclosed only to the people who need to know. Make sure that this is clear early on, not sprung on the pupil at the end.

It should be explained to children and young people that secrets can not and should not be kept if keeping them means that they, or others, may continue to be harmed.

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