

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 and complies 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 Child Act 1989, Children Act 2004, Data Protection Act 1998 and AEGIS guardianship accrediting body. Other references and guidance are taken from:

- Keeping Children Safe in Education, September 2019
- Safeguarding Children and Safer Recruitment in Education, July 2015
- Working Together to Safeguard Children, February 2019
- National Minimum Standards for Boarding Schools 2016

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

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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 the responsible.

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.

Designated Safeguarding Lead Cora Bayley Douglas; Email: cora@bg-london.com; Tel: 0044 7745 797588 Deputy Safeguarding Lead: Christopher Hignett; Email: christopher@bg-london.com ; Tel: 0044 7541 085852.

DSL and Deputy DSL have Safeguarding Children Qualifications and Child Protection Training.

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

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

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- 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.

The main definitions of abuse are:

Physical abuse - is a physical injury or physical suffering to a child (including non-accidental use of force, deliberate poisoning, suffocation, burning, Munchausen's Syndrome by Proxy etc.), where there is a definite knowledge, or a reasonable suspicion that the injury has been inflicted non-accidentally.

Sexual abuse - is the involvement of a child in sexual activity (e.g. rape, oral sex) which is unlawful, or to which a child is unable to give informed consent. This includes direct or indirect sexual exploitation and abuse of a child (e.g. production of pornographic material). It may be committed by individuals whether inside the home or outside. It may be committed by parents, or carers or other adults singly or acting in an organised way, or children. It includes acts which may be rewarded or apparently attractive to the child. It may be committed by individuals either known or strangers to the child; (Child sexual abuse differentiates from casual sexual relationship that does not include any sexual exploitation e.g. between a boy and a girl, though the boy can be liable for offences like indecent assault or unlawful sexual intercourse with an under-aged girl.)

Emotional abuse – is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. Emotional abuse (passive or active)

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may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. This form of abuse may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, including cyber-bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Neglect - is severe or a repeated pattern of lack of attention to a child's basic needs that endangers or impairs the child's health or development.

Neglect may be:

- Physical (e.g. failure to provide necessary food, clothing or shelter, failure to prevent physical injury or suffering, lack of appropriate supervision or left unattended); or
- Medical (e.g. failure to provide necessary medical or mental health treatment); or
- Educational (e.g. failure to provide education or ignoring educational needs arising from a child's disability); or
- Emotional (e.g. ignoring a child's emotional needs, failure to provide psychological care).

Psychological abuse - is the repeated pattern of behaviour and attitudes towards a child or extreme incident that endangers or impairs the child's emotional or intellectual development. Examples include acts of spurning, terrorising, isolating, exploiting or corrupting, denying emotional responsiveness, conveying to a child that he/she is worthless, flawed, unwanted or unloved (refer to Major Types of Psychological Abuse at Annex I to Chapter 2 of the full document by the Social Welfare Department - in the link above - for details). Such acts damage immediately or ultimately the behavioural, cognitive, affective, or physical functioning of the child.

Domestic abuse - Witnessing domestic abuse is child abuse, and teenagers can suffer domestic abuse in their relationships.

Online abuse - Any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones.

Emotional abuse - Children who are emotionally abused suffer emotional maltreatment or neglect. It's sometimes called psychological abuse and can cause children serious harm.

Child sexual exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status.

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Female genital mutilation (FGM) - The partial or total removal of external female genitalia for non-medical reasons.

Bullying and cyberbullying - can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

Child trafficking - is where children are recruited, moved or transported and then exploited, forced to work or sold.

Grooming - Children and young people can be groomed online or in the real world, by a stranger or by someone they know - a family member, friend or professional.

Harmful sexual behaviour - Children and young people who develop harmful sexual behaviour harm themselves and others.

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.
- 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.

Belgravia aims to provide a safe and secure environment for all students by liaising with parents,

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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; Cora Bayley Douglas Email: cora@bg-london.com; Tel: +44 7745 797588 or in her absence Deputy Safeguarding Lead: Christopher Hignett; Email christopher@bg-london.com ; Tel: +44 7541 085852. 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 [July, 2018]*.

The details of the Partnership for Belgravia are below:

Role Name Contact Belgravia Guardians Designated Safeguarding Lead UK Office

Cora Bayley Douglas +44 7724 201894 (24-hour contact)

Belgravia Guardians Deputy Designated Safeguarding Lead UK Office

Christopher James Hignett (If the Designated Safeguarding Lead is unavailable)

+44 7541 085852

Belgravia Guardians Staff Hong Kong Office

Caroline Drewett Ka Wai Wong Chloe Wong

+852 5922 1187 +852 6623 5852 +852 6895 8447

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Surrey's Surrey Local Safeguarding

Local Authority Children Partnership Contacts

Designated Officer (LADO)

Surrey Children's Single Point of Access (C-SPA)

UK Police (If you suspect a child is imminent danger)

Clinical Commissioning Board

0300 123 1650 LADO@surreycc.gov.uk

0300 470 9100

999

01483 405450

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

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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 than 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 should be encouraged to acknowledge their individual responsibility to bring matters of unacceptable practice, performance or behaviour to the attention of Belgravia and its management. 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 1).

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,

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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.

For more information, please refer to appendix

X.

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.

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E-Safety and 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://cypvle.lancsngfl.ac.uk/login/index.php>

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 annual training from the DSL or Deputy 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 Appendix **XX**).

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

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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.

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 XX).

- 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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