



**GUARDIANS
INTERNATIONAL**

**SAFEGUARDING & WELLBEING
POLICY AND PROCEDURE
DOCUMENT**





Summary

This safeguarding policy demonstrates the commitment by Guardians International Support to deliver a duty of care to students, host families, parents and GIS staff. The document summarises current working practices incorporating Child Safeguarding & Protection, Missing Children, Safer Staff Recruitment, Whistleblowing, Welfare, Health & Safety, Confidentiality & Data Protection, Complaints Management, Professional Code of Conduct, and Use of IT & Internet.

Our Child Protection Policy should be read in conjunction with this document and complies with guidelines given by AEGIS accreditation and QEGUK validation. There are links to Parents / Students Agreement and Handbooks for Students and for Homestays.

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Introduction

GIS aim 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 validation / accrediting bodies. 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, March 2015
- Working Together to Safeguard Children, Update 2018
- National Minimum Standards for Boarding Schools 2016

Our Designated Safeguarding Lead (DSL) attends multi-agency safeguarding training and is aware how to access 'Local Safeguarding Children Boards' and the new Safeguarding Partners being rolled out as a result of the Update 2018 to Working Together to Safeguard Children to be implemented by September 2020. We also know and have processes to access industry experts across the country for guidance or call the non-emergency police number 101 or 999 in an emergency.

Application & Aims of the Policy

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

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- Provide policy and procedures to follow in the event that a child safeguarding concern or issue is identified
- Assure confidentiality of all documentation and secure data
- Promote a safer recruitment procedure
- Review annually and update policy in response to regulation changes

Safeguarding

Mission statement

GIS is committed to ensure the safety and welfare of all young people under its guardianship and expects 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. (Legal definition of a child is anyone under the age of 18). We also expect these principles to be applied to young people who are aged 18 and over for whom we are the responsible Guardian organisation. We recognise that international students are a particularly vulnerable due to the nature of being abroad and in a foreign country, within a new culture and using a foreign language.

Our Mission is – WE CARE:

To provide a safe and nurturing environment for children to flourish, grow and achieve.

To promote this we will:

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.

Safeguarding Policy & Key Principles

GIS recognises that child safeguarding is a multi-agency proactive process focused on protecting children and 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.

GIS recognises that there are many forms of child abuse and ways that a child may be at risk the main categories are:

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

Sexual abuse - involves forcing or enticing a child or young person to take part in sexual activities, including prostitution,

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whether or not the child is aware of what is happening. The activities may involve physical contact including both penetrative or non-penetrative acts such as kissing, touching or fondling the child's genitals or breasts, vaginal or anal intercourse or oral sex. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. This form of abuse can happen online.

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) 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 – Neglect is the ongoing failure to meet and child's basic needs and is the most common form of child abuse. The four types of neglect are physical neglect, educational neglect, emotional or medical neglect. For example, a child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may be put in danger or not protected from physical or emotional harm.

They may not get the love, care and attention they need from their parents. A child who's neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage – even death.

Radicalisation & Extremism – GIS recognises its duty to protect our students from indoctrination into any form of extreme ideology which may lead to the harm of self or others. This is particularly important because of the open access to electronic information through the internet. Our aims to safeguard young people through educating them on the appropriate use of social media and the dangers of downloading and sharing inappropriate material which is illegal under the Counter-Terrorism Act. Our definition of radical or extreme ideology is 'a set of ideas which could justify vilification or violence against individuals, groups or self.' Staff and homestays are trained to be vigilant for spotting signs of extremist view and behaviours and to always report anything which may suggest a student is expressing opinions which may cause concern. Our core mission of diversity permeates all we do. We place a strong emphasis on the common values that all communities share such as self-respect, tolerance and the sanctity of life. We work hard to broaden our students' experience, to prepare them for life. We promote that they respect and value the diversity around them as well as understanding how to make safe, well-considered decisions. At GIS we follow the government endorsed prevent strategy and adhere to the Prevent Duty 2015.

Some Definitions:

Radicalisation: refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism: We have adopted the 2011 Prevent Strategy definition as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism, calls for the death of members of our armed forces, whether in this country or overseas.

British Values: include democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

Signs of Vulnerability: There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase the risk. These include:



- Continual refusal to conform
- Underachievement
- Being in possession of extremist literature
- Poverty
- Social exclusion
- Traumatic events
- Global or national events
- Religious conversion
- Change in behaviour
- Extremist influences
- Conflict with family over lifestyle
- Confused identity
- Victim or witness to race or hate crimes
- Rejection by peers, family, social groups or faith

Recognising extremism: Early indicators of radicalisation or extremism may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school (but there are also very powerful narratives, programmes and networks that young people can come across online so particular individuals / groups may not become apparent)
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others

Procedure for referrals:

Although serious incidents involving radicalisation have not occurred with GIS students to date, it is important for us to be vigilant and fully informed about issues that affect the local and wider area. Staff and host families are reminded to suspend any disbelief that incidents of radicalisation ‘could not happen here’ and to refer any concerns to the DSL immediately.

There are other areas that children need protection from including:
Cyber-bullying and bullying
Online abuse
Grooming

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Domestic abuse
Radicalisation and extremism
Child trafficking including Child Sexual Exploitation
Female Genital Mutilation
Harmful sexual behaviour

GIS understand that Child Protection is an integral part of safeguarding and promoting children's welfare. GIS 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 Safeguarding training (to an appropriate level) 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 GIS (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.

GIS 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 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.
- All staff and homestays are recruited in line with the Safer Recruitment policy contained within this document.
- Student and homestay folders are updated regularly and a minimum of annually.
- 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.
- GIS maintains a data base of safeguarding contacts in each of the schools that it uses.

Any concerns should be raised immediately with the Designated Safeguarding Lead and in his absence with his Deputy. If it is felt that a child is at immediate risk of significant harm than the police should be contacted on 999.

Safer Staff Recruitment and Training

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

During any recruitment process the following policies and procedures must be adhered to:

Alignment

All persons applying to work with GIS are expected to uphold the principles contained with our mission statement and agree to how we will achieve this.

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Advertising

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

All advertisements state clearly that applicants will be required to undertake an enhanced Disclosure and Barring Service check.

DBS Checks

All guardianship staff and all members of host families aged 16 or over will undergo Enhanced DBS checks with the Disclosure and Barring Service before being appointed. Authorisations to undertake such checks from each individual is obtained and is made clear to the applicant on the application form. GIS will maintain a central system for holding and protecting all data.

All DBS checks on all staff and homestays must be renewed every four years.

Applications

All members of staff and homestays are required to complete an application form that is relevant to their position and potential. All application packs contain a declaration that the individual knows of no reason why they are not “fit and proper” to hold such a role. Applicants are also be required to sign an agreement for GIS to undertake an Enhanced DBS check including for 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 must include one professional and one personal/ character. These referees show 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 contacted directly by GIS and references 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 GIS 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.

Recruitment Process

The recruitment process is split into two sections:

1. Staff recruitment
2. Homestay recruitment

Staff recruitment

Normally an initial telephone interview will be conducted to judge the suitability and motivation of the candidate. At this stage the recruitment process should be explained and the requirement for enhanced DBS checks clearly highlighted with any points of interest or areas for further exploration noted for further investigation at the face to face interview stage. All telephone interviews should be conducted by an experienced member of staff or someone who has been trained in Safer Recruitment.

Prior to a formal face to face interview applicants should be again reminded that they will need to provide identity documentation, and documentation for an Enhanced DBS check to be undertaken.



All interviews will be conducted by two senior members of staff one of whom will be trained in Safer Recruitment. The interview shall assess and evaluate the applicant's suitability for the post and explore the candidate's motivation for working with children and young people, their understanding of safeguarding and their ability to support the GIS's agenda for safeguarding and promoting the welfare of children. The applicant should be asked (if appropriate) if they wish to declare anything in light of the requirement for an Enhanced DBS disclosure.

All applicants will be assessed equally against the criteria contained in the job description and person specification and offers of employment are made conditionally on receipt of all documentation, enhanced DBS and a successful probation period. Copies of our Child Protection and Safeguarding policies will be made available to all employees, volunteers or individuals working in any capacity within GIS.

Homestay

The welfare of the child is paramount at every stage of the recruitment process, and this policy applies to the recruitment of all host families and travel / transfer companies. Advertisements will reference the responsibility for safeguarding and promoting the welfare of children in the job description and that applicants are required to complete an enhanced Disclosure and Barring Service check.

An initial telephone interview is conducted with the homestay applicant and the 'Homestay Application Interview' template should be used to ensure all required information is collected and questions are answered. All responses should be recorded and during this interview the potential homestay should be informed that a formal homestay interview and suitability assessment will be carried out. They should also be informed that they will need to undertake an Enhanced DBS check and that they will need to provide documentation to facilitate this. It is important that at this stage that the homestay is made aware of GIS's focus on safeguarding and keeping our children safe which includes the need for them to provide a safe environment for them to stay in.

If a homestay is suitable for a face to face home check, a convenient appointment time should be agreed and the host family and they must be informed that they will need to:

- Complete an application form and declaration of suitability;
- Provide two references in line with GIS's reference policy;
- Undertake Enhanced DBS checks for all adults and children over the age of 16;
- Where a DBS check is required provide all relevant documentation for an enhanced DBS to be carried out e.g. passport, driving licence, original birth certificate, bank statement, council tax statement etc....;
- Accept that GIS will be required to take pictures of their home and home environment to satisfy itself of the applicants suitability;
- Ensure that smoke and carbon monoxide detectors are fitted in the house;
- First aid provisions are available;
- Provide access to car and household insurance policies which will be checked and copies / photographs taken;
- Provide evidence of safeguarding and child protection awareness.

An initial visit is made to the homestay and an interview is to be carried out that assesses the suitability of the host family to meet the high standards for homestays required by GIS. The 'Homestay Application Interview' template originally completed for the telephone interview should be used and all relevant pieces of information gathered and questions answered.

Particular attention is paid especially to the kitchen; bathroom, student bedroom and photographs are taken with permission of the homestay. If a car is to be used to transport the student, it is looked at carefully where possible. Safety of electrical and gas equipment is assessed and an annual gas safety certificate is required. During the interview stage all original documentation must be seen and copies / photographs taken for future reference.

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Targeted questioning will focus on the services to be provided and the responses will be recorded. GIS request a declaration whether anyone living in the household has ever been convicted of a criminal offence or been placed on a list recording they are unsuitable to work with children or vulnerable adults.

All questions and answers need to be recorded fully and copies uploaded to the homestays application file along with all pictures and other documentary evidence.

GIS additionally request two written references, personal and professional, from individuals who have known the applicant for more than two years (excludes family members) who must provide a passport or driving license as proof of identity. The referees will be contacted by telephone. Incomplete application forms will not be processed and all employment gaps must be explained and verified. Any false information provided to GIS will result in the application being refused.

Regular monitoring and cross-fertilisation of information between the Homestay, Student and GIS has a strong focus on the wellbeing, safeguarding and child protection of the student. Relevant information is carefully recorded in the student care folders maintained by GIS as well as the host family the registration and general folders maintained by GIS. To assess the ongoing suitability of a homestay an annual visit will be made and feedback must be obtained from students.

Copies of the GIS Child Protection, Safeguarding policies and Host Handbook should either be left with the Homestay applicant or made available to them whilst we are undertaking any required final checks and references.

Homestays will be provided with the appropriate level of training and guidance directly from GIS and eLearning of child protection and safeguarding is being trialled in 2017.

Appointments. In the case of homestays additional monitoring will be in place during the probationary period which lasts for six months.

Travel & Taxi Company Recruitment

All taxis providers are verified via the school and only licenced taxis will be used who are known to the school at which the child is studying. Since 2012 all licenced taxis drivers are eligible for standard DBS checks, however GIS will use in preference taxi firms who have enhanced checks which many local councils and licencing authorities apply for. All taxi firms will be checked with the local authority to ensure they are properly licenced.

At all times the safety and wellbeing of the child must be put before any other consideration including cost and parental pressure. No child under the age of 16 may travel on public transport alone and under the age of 13 must be accompanied by an adult either from the school or a DBS checked escort accredited by GIS.

Training

GIS is fully committed to the necessity for annual and appropriate training at all levels of the organisation. The DSL takes advantage of training opportunities throughout the year and cascades information through the organisation. Guidance in Student, Staff and Homestay handbooks is reviewed and updated annually, as are relevant policies. These handbooks provide details of necessary contacts. Safeguarding and Child protection guidance is offered to Homestays annually, usually as part of the cascade process.

All senior staff and staff that are involved directly with welfare, care or movement of children will have to undertake at least one piece of safeguarding training every year.

GIS is using a multi-channel approach to safeguarding training for its homestays including:

- Online Safeguarding awareness training.
- Safeguarding & Child Protection updates via emails.

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- Face to face training during homestay visits.
- Specific training interventions via paper including safeguarding legal updates, best practice, immediate actions, local contacts etc...

All staff and host families should read Keeping Children Safe in Education part A as a minimum and this will be provided to everyone upon joining the GIS community.

All staff and host families must be provided with a copy of the GIS SAFER RECRUITMENT AND TRAINING POLICY and use these for more detailed guidance.

Responses to Safeguarding Concern & Missing Child

Students are provided with a 24/7 telephone number to access either the Head Office Staff or one of the Safeguarding Leads to assist them at all times. They are made aware of how to access advice and support from The Samaritans, NSPCC, ChildLine and Police are available.

The policy and procedure for responding to any safeguarding concern are the same as laid out in the GIS Child Protection Policy document and the same reporting procedure is used.

Most importantly all safeguarding concerns must be raised with the DSL or his deputy as quickly as possible and if there is concern that a child may be at immediate and severe risk the Police should be contacted – the child must come first. Staff must submit their concerns in writing and ensure that they receive formal acknowledgement from the DSL that this concern has been received and action is being undertaken.

In the event of a missing child, schools have the lead on any incidents which happen during the term time. GIS respond to incidents during exeat weekends, half terms or during a period of expulsion/suspension where the student is with a GIS Host Family or travelling to and from either the host or airport unarranged by the school.

Students being reported as absent or missing to GIS from, Schools, Host families or travel providers are initially regarded as children in need. The either the Designated or Deputy Safeguarding Lead is notified and takes responsibility for the response of GIS. All reasonable, safe and speedy means are used to locate the student and may mean referral to the Police.

If you have concerns or are worried that a child in your care has gone missing you should consider the following:

- That child is at **immediate** risk of coming to harm – call 999 and engage the Police.
- That child **may be** at risk of coming to harm – call 111 and discuss with local Police.
- The child is **not at immediate** risk of harm but you are concerned – call GIS emergency contact number **0843 557 5578**.

At all times you should contact GIS's emergency number and inform us of your concerns / issue.

If any child is persistently late then you should contact GIS and discuss the issue with one of the Safeguarding team.

The GIS Guardianship Student Record is assessed in order for the incident to be effectively managed so the safety of the student can be maximised. Any report pertaining to Child Protection will be automatically classified it as a RED incident.

All incidents are investigated through discussions with the school, parents, existing records and other agencies as appropriate. Parental consent for referral will be sought unless the child may be at risk of significant harm or there may be the risk of a loss of evidential material. All verbal conversations should be recorded in writing, with details such as date, time, location, names of those

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present and so on attached. It may be appropriate to note the physical and or emotional demeanour of the child. It is the role of the DSL or his deputy to investigate; all others involved should describe and explain relevant information but it is not their role to investigate.

Where conversations with the child are held and recorded it must be made clear to the child that information will be passed on. The information is evaluated on the day of receipt and a decision made and recorded regarding the next course of action and/or outcome. This could include no further action or future actions, or emergency action to protect a child through the statutory

Authorities (e.g. Police or Social Services) where there is a risk to the life of a child or the possibility of serious immediate harm. Should the investigation so indicate, the student could be a child 'in need' and a referral would be made to social services. GIS DSL must review and approve the outcomes of the incident and ensure the record has been updated.

The Local Safeguarding Childrens Boards for the areas that we operate in are available in attachment 1 to this document or can be found at <https://www.safeguardingschools.co.uk/list-of-lscb-local-safeguarding-child-boards>

The above LCSB's are being replaced by Safeguarding Partners and during 2020 these new partnerships will be identified and notices sent to all homestays.

Code of Conduct & Behaviour

All staff are expected to behave professionally at all times and to abide by the principles and policies of the organisation. Confidentiality is a matter of the highest importance. Awareness of safeguarding and child protection is essential. Guidance is available from Senior Management but at all times staff will:

- **Comply with the law** - All employees must protect our company's legality. They must comply with all child legislation, environmental, health & safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.
- **Respect in the workplace** - All employees must respect their colleagues. We won't allow any kind of discriminatory behaviour, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.
- **Protection of Company Property** - All employees should treat our company's property, whether material or intangible, with respect and care.
 - Shouldn't misuse **company equipment** or use it frivolously.
 - Should respect all kinds of **incorporeal property**. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.
 - Employees should **protect company facilities and other material property** (e.g. company cars) from damage and vandalism, whenever possible.
- **Professionalism** - All employees must show integrity and professionalism in the workplace.
- **Personal appearance** - All employees must follow our dress code and personal appearance guidelines.
- **Corruption** - We discourage employees from accepting gifts from clients or partners. We prohibit bribes for the benefit of any external or internal party.
- **Job duties and authority** - All employees should fulfil their job duties with integrity and respect toward customers, students, schools and other stakeholders and the community.



- **Absenteeism and tardiness** - Employees should follow their schedules. We can make exceptions for occasions that prevent employees from following standard working hours or days. But, generally, we expect employees to be punctual when coming to and leaving from work.
- **Conflict of interest** - We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their job duties.
- **Collaboration** - Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.
- **Communication** - All employees must be open for communication with their colleagues, supervisors or team members.
- **Benefits** - We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.
- **Policies** - All employees should read and follow our company policies. If they have any questions, they should ask their managers or Human Resources (HR) department.

At all times if staff are uncertain they should refer to the Managing Director for guidance.

Complaints /Whistleblowing/Allegations

This policy addresses all staff, parents, students, homestays, transport providers and volunteers. All staff, homestays, transport providers, parents, students and schools used by GIS should be encouraged to acknowledge their individual responsibility to bring matters of unacceptable practice, performance or behaviour to the attention of GIS and its management.

GIS recognise that there may be legitimate concerns from students, parents, agents, host families or transfer companies and as an organisation; we encourage these concerns and their resolution in order to improve our service.

Complaints are to be submitted in writing to: Jonathan Sherry, Wagoners Barn, Lullingstone Lane, Eynsford DA4 0HZ.

Give a clear description of your complaint, include copies of any supporting evidence such as emails, letters, texts and give an email or postal address so we can reply.

GIS supports reporting of suspected wrongdoing in the workplace and encourages all personnel, partners and volunteers to report any serious concerns they may have about any aspect of the company including welfare, health and safety, grievance, harassment, bullying, disobeying the law, malpractice, data protection and recruitment. Those wishing to make a disclosure may do so to any member of the team, a manager or supervisor, to the Senior Member Team or to an accredited body for example AEGIS, QEGUK or to the Local Authority.

We are committed to the highest possible standards of integrity and our procedures are guided by the Equality Act 2010. When a concern has been raised, the Designated Safeguarding Lead (or his Deputy) will provide support for a member of staff who has raised a concern and support for a member of staff against whom allegations have been made; keeping both parties informed of all progress during any investigation. We will take no action against a member of staff if, after investigation, their concern has not been confirmed, however we will take disciplinary action if a concern is raised maliciously.

GIS will assess if any criminal offence has been committed, is being committed or is about to be committed or a person has failed, is failing or is about to fail in compliance with any GIS conditions and obligations.

GIS will assess if a health and safety issue has endangered, is endangering or is likely to endanger any person.

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If the complaint is regarding a senior staff member an external body for reference can be contacted such as the Local Child Safety Board or NSPCC or one of GIS accreditation bodies.

A response to the complaint will be set out within 14 working days and an internal enquiry will take place to decide on a conclusion or referral and all parties will be notified in writing of the outcome. If anyone within the process feels the conclusion is inadequate they are encouraged to seek further advice from an independent body.

We cannot deal with official complaints about individual schools or their staff – these should be directed to the institutions concerned.

Data Protection and Use of IT/Internet

GIS is registered with the Information Commissioners Office and is familiar with the Data Protection Act 1998, which contains principles governing the use of personal data and all records necessary to the efficient running of the organisation. Information technology includes all forms of computing, the internet, telecommunications, digital media and mobile phones.

Staff members must be aware of the principles of the Computer Misuse, Copyright and Data Protection Act 1998. If a member of staff is in any doubt about whether to share information or keep it confidential or has a complaint regarding data protection he or she should seek guidance from the managing Director of Safeguarding.

Procedures of reporting and responding to child neglect and abuse are set out under our Child Protection Policy document. There is nothing in data protection legislation which limits appropriate disclosure in order to protect a child. Questions to consider are:

Is the proposed disclosure a proportionate response to the need to protect the welfare of the child?

Is the amount of confidential information disclosed and the number of people to whom it is disclosed necessary? No more information should be should be no more than is strictly necessary to protect the health and wellbeing of the child. The more sensitive the information is the greater the child focussed need must be to justify disclosure and the greater the need to ensure that only those professionals who have to be informed receive the material.

Internet

The use of the internet, web based or mobile communications and social media by staff members must be appropriate and lawful, proportionate and ethical. All confidential information must be sought by consent and not disclosed to unauthorised recipients. The following list is a guide of practices considered as misconduct;

- misuse of the internet and/or email to access or distribute material of a pornographic, offensive, obscene or inappropriate nature accessing or disclosing information on or obtained from GIS internal systems for unauthorised purposes or persons
- disclosure of confidential information for unauthorised purposes or to unauthorised persons.

GIS staff have access to personal confidential information about students, their families, and staff members. This information is stored and processed in accordance with the Data Protection Act 2018 GDPR complaint. It must be:

- used fairly and lawfully;
- used for limited, specifically stated purposes and suitable periods of time;

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- accurately;
- stored securely.

GIS 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 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. GIS 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 their further use in any form requires their permission. It will provide guidance for homestays also and explain signs to look for in a child who is worried, such as a major change in demeanour, displays of anxiety or sleeplessness.

All staff and host families must be provided with a copy of the GIS INTERNET & E SAFETY POLICY and use this for more detailed guidance.

Welfare/Health and Safety

GIS follow codes of good practice relating to fire, smoke, gas and electricity by ensuring staff, parents, students and homestays are actively compliant with UK safety laws (The Workplace Regulations 1992). GIS ensures where possible, the health, safety and welfare of their employees at work (Health and Safety at Work Act 1974) Refer to our Health and Safety policy.

Monitoring visits to Homestays include observations of the health and safety environment; homestays should have an annual gas safety certificate and that Smoke and Carbon Monoxide detectors are in place.

All staff and host families must be provided with a copy of the GIS HEALTH & SAFETY POLICY STATEMENT AND POLICY AND CHECKLIST and use these for more detailed guidance.

Private Fostering and the Care Arrangement

GIS does not provide any form of fostering arrangements for the children under our care. However, best practice implies that we are aware of the arrangements needed to undertake the arrangement of a private fostering arrangement.

A private fostering arrangement is one that is made privately (with no involvement of the Local Authority) for the care of a child under the age of 16 years old (or 18 years old, if disabled) by someone other than a parent or close relative, with the intention that the **fostering arrangement should last for a period of 28 days or more**. In this regard, the overarching responsibility for the Safeguarding, Child Protection and promoting welfare remains with the parent or another person with parental responsibility.

A private foster carer **must** inform the Local Authority of his or her arrangements for private fostering. The Guardianship Organisation must also inform the Local Authority of arrangements for private fostering, in line with Reg.3 (2). An officer from the

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Local Authority's Children's Services' Private Fostering Team will visit the Homestay Family within seven days and provides a written report to the Local Authority based on a formal interview with the Homestay Family. Thereafter, a member of the Private Fostering Team makes regular visits at intervals of not more than six weeks apart. The foster carer must provide details of any change in circumstances and cessation of caring for a child.

Local Authorities responsible for safeguarding and protecting children must ensure that foster carers are suitable and that they get any support and guidance they may need to help them care for the child.

The educational establishment or school will be kept informed at all times of any changes in the host family / homestay circumstances.

Useful Contacts

GIS Director of Safeguarding & Designated Safeguarding Lead: Jonathan Sherry, jonathan@gis-uk.com Tel: 07958420313

GIS Deputy Officer for Safeguarding: Paula Sherry, paula@gis-uk.com Tel: 07887 516248

Emergency: 999

Non emergency Police: 101

Health Service: 111

Child line: 0800 1111, Freepost 1111, London, N1 0BR. www.childline.org.uk

Social Services / Safeguarding Children's Boards: refer to the internet for details of the specific Local Authority.

The police manage the MAPP service, (Multi Agency Public Protection Arrangements), if someone is considered to be a significant threat to the community.

www.familylives.org.uk - Provides help and support to parents and carers

NSPCC website

www.getsafeonline.org/safeguarding-children