



CHILD PROTECTION  
POLICY AND PROCEDURE  
DOCUMENT





## Summary

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**This child protection policy** is linked to Guardians International Support's (GIS) Safeguarding policy and describes the child protection roles, responsibilities of staff, the procedures for identifying and managing child protection concerns and issues, and for mitigating risks to the safety and welfare of students.

**Our Safeguarding Policy** *should be read in conjunction with this document* and complies with guidelines given by various accreditation and validation bodies. There are links to Parents / Students Agreement and Handbooks for Students and for Homestays.

**Designated Safeguarding Lead & Director of Safeguarding:** Jonathan Sherry; Email: jonathan@gis-uk.com; Tel: 07958 420313

**Deputy Safeguarding Lead:** Paula Sherry; Email paula@gis-uk.com; Tel: 07887516248

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## Introduction

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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 accrediting body. Other references and guidance are taken from:

- Keeping Children Safe in Education 2020, updated January 2021
- Safeguarding Children and Safer Recruitment in Education, July 2015
- Working Together to Safeguard Children 2018
- Working Together to Safeguard Children: Statutory Framework July 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

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The aim of the policy is to set out the processes and provisions in place to ensure all possible steps are taken to:

- Provide a safe environment for our students while under the guardianship of the company
- Effectively and efficiently identify and manage cases where students are at risk or have unmet safeguarding needs
- Promote the importance of safeguarding and child protection across all areas of the business

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- Regularly evaluate our processes and management of safeguarding incidents with a view to continuous improvement of our safeguarding and child protection policies

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

This policy supports GIS's duty to safeguard and promote the welfare of students and is made with reference to Statutory Guidance for Schools and Colleges on Safeguarding Children and Safer Recruitment in Education, Department for Education, July 2015: Keeping Children Safe in Education, September 2019 and Working Together to Safeguard Children, Updated 2018.

GIS's policies and processes are in line National Minimum Boarding Standards and sector specific accredited training experts. The company refers to various expert sources advice on child abuse and safeguarding, for example NSPCC website, Barnardo's and the Local Safeguarding and Children's Board and / or local Safeguarding Partners when developing policies and managing incidents.

GIS is aware of how to access local agency contacts. This includes referrals to Multi Agency Safeguarding Hubs (MASH) and Local Safeguarding Partnerships (LSP) across the country, how to access locally agreed inter-agency procedures, guidance and contact with LSP contacts.

In addition, the company is aware of the non-emergency reporting procedures via the Local Authority's Children's Services relevant to the area or MASH (via the relevant contact telephone numbers on the internet), or by telephoning 101 to report a non-emergency. For emergency situations, the company is aware of the need to contact the relevant police force for the area by dialling 999.

This policy applies to all full time, part time, contracted, agency and volunteer staff including those who do not have cause to come into direct or regular contact with students in order to carry out their daily duties. This policy also applies to those who provide homestay accommodation for our students and third party contractors.

## Child Protection Principles

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GIS is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

A full set of definitions is contained with our Safeguarding Policy under the heading "**Safeguarding Policy & Key Principles**" page 3. **Also a glossary of terms is contained at the back of this Safeguarding Policy as well for reference.**

The following principles underpin our provisions and practices in relation to safeguarding and child protection:

- GIS will provide a safe and secure environment for all students
- Host families and transfer companies provide a safe and secure environment for all student
- All students feel safe, secure and protected from harm
- All students know who to turn to for help, advice or support, can access services confidentially, quickly and easily and have access to 24-hour support
- GIS has a Designated Safeguarding Lead who has overall responsibility for the safeguarding and welfare of the students
- The Directors of the company have overall accountability for the safeguarding and welfare of the students
- All staff share in the responsibility to protect students from harm, remain vigilant in identifying safeguarding and child protection issues and to follow policies and procedures relating to safeguarding and child protection
- Students and staff have effective means by which they can raise child protection concerns or report issues
- Staff have at least one reliable means to contact all students quickly and directly
- Staff are aware of the medical or learning needs of individual students via the Student Registration and Profile in



#### GIS Data Drive

- In cases where the whereabouts of a student under GIS guardianships is not known or the student is believed to be at risk of harm, procedures to locate the student by the safest and quickest means possible, or secure the safety of the student will be invoked immediately
- The company has procedures in place that enable child protection concerns and incidents to be dealt with promptly and effectively and in line with relevant legislation

GIS is committed to the protection of all children in its care and to keep our students safe while they are here and to improve the quality of our service and standards as we grow. We are committed to safeguarding student welfare and undertake rigorous checks on all who work with us and we expect all staff and volunteers to share this commitment.

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

- child sexual exploitation
- radicalisation and extremism
- female genital mutilation
- physical, emotional, sexual abuse or neglect
- domestic abuse
- online abuse
- bullying and cyber bullying
- child trafficking
- grooming
- mental health
- violent crime and criminal activity

We aim to ensure that the students in our care experience at all times a caring and secure environment in which they feel safe, respected and valued. In pursuit of this aim, GIS undertakes the following:

1. To train all staff appropriate Child Protection training. All staff maintain the responsibility of responding to Child Protection concerns raised by students, other guardianship personnel, host families and transfer companies.
2. To ensure staff record any allegations/concerns in an incident in the Safeguarding reports and refer them to the Director of Safeguarding. Where appropriate concerns will be reported to the relevant Children's Services Duty team or Multi Agency Safeguarding Hub (MASH) in the local area.
3. To ensure that a GIS "on Duty Director" is available for advice and guidance if staff are not sure whether a referral to Children's Services is required. The On Duty Director is able to contact the Director of Safeguarding for advice in relation to referrals.
4. To require all guardianship personnel receive Child Protection Awareness Training and to make them and the students in our care aware of the need to report allegations and suspicions of child abuse to Head Office. In cases where the Safeguarding leads are unavailable, staff must make direct contact where appropriate with the local Children's Services or MASH On Duty Team, as delay could put a child/Young Person at further risk of harm. Contact with the local Children's Services or MASH is made via the telephone numbers available on the Local Authority website.
5. To promote an environment of trust, openness and clear communication between students, school and GIS staff and our Host Families, so that student welfare, safety and pastoral care is recognised as the top priority.
6. To respond to any reported allegation or suspicion of child abuse in accordance with the GIS guidelines and to do so with sensitivity and care with the child's welfare as the primary concern.
7. To ensure that all staff that come into direct contact with students in our care are recruited using safe recruitment practices and are formally screened through the completion of an Enhanced DBS check.
8. To maintain links with the appropriate Agencies who have a statutory responsibility to deal with child welfare and

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child protection concerns. If you have any reason to believe that a child in your care is suffering from any form of abuse or neglect then please report it immediately in confidence to the GIS Designated Safeguarding Lead or Deputy Safeguarding Lead by telephone immediately via their mobile telephones.

## Child Protection Procedures

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This document is designed to set out clearly for employees, host families, volunteers working for or with GIS the procedures you should follow if a child under our guardianship discloses a worry or concern to you, or if you have cause to be concerned about anything you have seen or heard, in relation to that student or any staff member.

All staff members are aware of their role to play in safeguarding children and identifying concerns early to allow us to provide early help, and prevent concerns from escalating. This includes for example school staff, host families, other parties that have access to students who are acknowledged as being part of the wider safeguarding system within the company. When dealing with child protection or safeguarding concerns, GIS works in partnership with the students, school, parents, agent and statutory authorities including the police, Social Services and health services.

All staff members are aware of the systems within the company which support safeguarding and child protection including the policy, staff behaviour policy and the designated safeguarding lead. All staff members receive appropriate child protection training which should be regularly updated.

All members of staff should be aware of the signs of the four main categories of abuse – physical, emotional, sexual abuse and neglect. This will mean that staff are able to identify cases of children who may be in need of help or protection. Staff members should maintain an open mind as child abuse can happen anywhere, and should always act in the interests of the child. The signs and symptoms of abuse (for example cyber-bullying, grooming or sexual exploitation) are detailed in Keeping Children Safe in Education 2020 updated January 2021 (KCSIE 2020) as well as other accessible media such as the NSPCC website and on each area's Local Safeguarding Partnership's (LSP) website.

**A cause for concern or disclosure could be any of the following, all of which should be taken seriously:**

1. that someone has touched them inappropriately, sexually and/or in a way to make them feel uncomfortable;
2. that someone has physically abused them, i.e. hit them or they have unexplained/unusual injuries;
3. that someone has verbally abused them, shouted, been constantly critical of them;
4. that they are being bullied;
5. that they are not being fed appropriate amounts or types of food either at school in their host family;
6. that washing facilities at the host family are inadequate;
7. that they saw or heard something that troubled them at the host family, on a computer, on TV or around the house.

The incident could have occurred in a host family, taxi, at a friend's house or at school. Children may also disclose something to you that has happened to them at home in their country of origin. Whatever the matter, please follow the guidelines in this manual and report the matter to our Designated Safeguarding Lead.

## Indicators of child abuse and response to individual concerns

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There are potential indicators of the four main types of abuse which staff should be aware of and these include:

- Children going missing particularly on repeat occasions.
- Problems with drugs or alcohol which may be seen in the student appearing not to be looking after themselves.



- Mental health problems such as depression and eating disorders which may be seen in significant weight loss or weight gain.
- Self-harm and/or suicidal thoughts.
- Child is unusually quiet, withdrawn or isolating themselves.
- Behavioural problems including anti-social behaviour and criminal behaviour.

Staff must deal with any concern or follow up of a disclosure or suspicion that a child is being abused and this must be done immediately. Initial enquiries are often dealt with locally via the school or host family with later decisions and communications being made centrally by the DSL.

As equally important as following up suspected child abuse information immediately, as you are the person the child has chosen to trust and disclose the problem to, you must remain in touch with them regarding any feedback or follow up that is needed. Any problem you report, however, minor, will be discussed by GIS's DSL and / or Deputy DSL, in consultation if necessary with, LSP's, Children's Services, MASH, NSPCC or other external agency as appropriate.

#### **A student reports or discloses something to a member of staff or host family**

- Reassure the child and listen carefully – it is important that they know you believe them.
- Do not say you will not say anything to anyone – in fact you have a duty to disclose this to another person so do not promise confidentiality.
- Make sure you take detailed notes, write everything down.
- Ask open questions if appropriate, do not lead the conversation to find out what has happened. Use words such as tell me, explain or describe, and allow the student to speak.
- Avoid words such as what, why, how when – these will be asked by the relevant agency if appropriate.
- Feedback to Jonathan Sherry DSL as soon as practicable on 07958420313 at any time.

In the unlikely event that the student is in immediate danger for example in a host family, at school or at any other place, we must remove the student from the situation or ensure immediate help is sent to them. The reasons for their departure should remain confidential to all parties. Jonathan Sherry will review the situation and if appropriate the relevant statutory agencies will be informed.

As important as recording information from the student is the recording of information disclosed to you, for example by the host family or taxi company. All information provided should be recorded by any member of GIS staff and original records should be retained.

GIS is committed to dealing with any allegation made against people working, looking after or living with children, to enable the allegation to be dealt with fairly, effectively and in a timely fashion.

There are various sources of an allegation or information of potential child abuse which staff need to be aware of. Allegations or information relating to a child potentially being abused may arise in a number of ways:

- From a teacher/host parent, taxi company or from a host family.
- From a student concerning his/her friend.
- From a staff member about another member of staff or in a voluntary activity, or within his/her family or private life.
- As an anonymous phone call.
- Information contained within a written report from a member of staff.

On receipt of an allegation or information staff are required to treat the matter seriously, not make assumptions or offer alternative explanations. The following guidance must be followed:

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- Please stay calm and listen carefully to the information that is being given to you.
- Remember that at this time it is 'ALLEGED'. You are simply responsible for collecting and reporting the information that you are given. Please avoid adding your judgement or personal opinions.
- Record all information in an accurate written record. This should include the time, date, and place of the allegation.
- Record the words that the child actually said to you – avoid translating the meaning of what you think the child said to you into your own language.
- Please do not do anything that might impede any investigative actions. Information should be recorded and reported in a timely manner and restricted to those who need to know the details.

The matter should be reported to the designated safeguarding lead, Jonathan Sherry. Please remember to include all of the written documentation and any notes that you have taken.

Please do not disclose any further information from this point until the next course of action has been decided by the designated safeguarding lead.

### **Receipt of a suspected report of child abuse by the Designated Safeguarding Lead**

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An emergency strategy meeting will be held to discuss the incident, assess the alleged threat and risk to the child, implement an action plan and continue to review the situation until a successful resolution has been achieved.

The incident will be recorded (with timed and dated entries) within a Student Record, on an 'Incident' template which will be assessed for disclosure to a statutory agency if this is in the interests of child protection.

For matters that are not deemed necessary for reporting to a statutory agency, the appropriate parties will be updated, for example the student, parents or school. For matters where advice is required, the local area's Children's Services or MASH will be contacted for expert guidance. GIS will always take the advice provided to them by a statutory agency as they will be in possession of more facts and information, leading them to make an informed decision about the correct course of action to take.

The Designated Safeguarding Lead (DSL) within the company is the person who is responsible for receiving concerns about the safety and welfare of children and young people.

#### **The DSL:**

- Will be the first point of contact for all staff and volunteers for advice and guidance to employers, voluntary organisations and community groups on issues relating to child protection.
- Ensures that staff undergo appropriate child protection and safeguarding training which is updated as per the required period of time.
- Ensures that all staff child protection training is recorded in a central log which is audited regularly to identify training needs and any recording gaps.
- Is responsible for updating the Safeguarding Policy annually.
- Ensures that the company complies with the safe recruitment procedures for new staff members and their induction.
- Makes formal referrals to the local area's Children's Services, MASH, police force or LSPs.
- Ensures that concerns are logged and stored securely with complete records of all child protection concerns, issues and incidents.
- Ensures that any safeguarding information is only available to DSL and DDSL and only ever shared on a

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needs to know basis.

- Has responsibility with the Directors, and all staff to ensure that the safeguarding policy and related policies and procedures are followed and regularly revised.
- Is responsible for promoting a safe environment for children and young people.
- Knows the contact details of relevant statutory agencies for example Children's Services, LSPs and the local area's police force.
- Ensuring that this policy is made available to students and to their parents/guardians.

## Recording a suspected report of child abuse by the Designated Safeguarding Lead

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Once a concern is raised or a report to the DSL or any member of staff they will initially be responsible for recording as much detail as possible whilst ensuring that they are not causing any further harm, stress or feeling of uncomfortable. The following activities will be undertaken:

- Where possible confidentiality will be maintained protecting both the person raising the concern, making the report unless to do so would run the risk of increasing the risk of harm.
- Anyone raising a concern or making a report including a student must be informed that they will be:
  - Be taken very seriously
  - A physical record will be created of their concerns, report
  - They will be referred to in the report but only named where it is absolutely appropriate to do so
  - All information will be treated sensitively and where possible in the strictest confidence
  - Details of the concern, report as well as their details may need to be shared with relevant agencies or appropriate external parties
  - They may or may not be contacted further regarding the matter either by GIS or other appropriate agency or party
  - The only priority is the safeguarding, welfare and well-being of the child
  - They should not expect to be reported back to on any on-going investigation or even if any investigation is closed or referred
- The person who is receiving the concern or report must make notes to ensure clarity of any information, timelines and details being provided.
- These notes should be written down and passed on to the DSL or DDSL along with a verbal report as soon as practical.
- The DSL or DDSL will use the GIS format for recording Safeguarding issues and concerns to ensure consistency.
- All actions to be taken and outcomes of these will be recorded and need to be closed withing the GIS report and tracker.
- This tracker may be shared with relevant and appropriate agencies e.g. LSPs as appropriate.
- If a risk assessment is undertaken then this will be done by the DSL or DDSL using the risk assessment report.
- Any inputs from other parties in any format e.g. emails, letters, calls, texts etc... must be logged and a copy record in the safeguarding file.

### Data and File Management

All safeguarding files are kept electronically and password protected which only the DSL and DDSL have access to under no circumstances will any staff member or external party be provided access to these. Any information shared from the files should always be challenged by the DSL and DDSL between themselves for the appropriateness and what has been shared and when must be recorded as part of the safeguarding reporting and tracking format above.

**All files will be stored for a minimum of ten years or longer if deemed appropriate.**

### Local Safeguarding Partnerships

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GIS will liaise with their Local Safeguarding Partnership (LSP) and work in partnership with other agencies in line with **Working Together to Safeguard Children 2018**.

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Partner schools have their own safeguarding policies. These can be found on their website and will include the contact details for their LSP. GIS recognises that if any safeguarding concerns occurred whilst a student was in a homestay that was out of the schools county then a different/additional LSP arrangement would be required as well. In this case, GIS will contact the relevant LSP and follow their procedures.

The Local Authority Designated Officer (LADO) will be contacted by the DSL where there is sufficient information to suggest that a child has, is being or is at risk of abuse. The LADO will be contacted for further advice from the relevant statutory authority, or where appropriate an immediate referral will be made to the relevant area's Children's Services or MASH.

In the event of any contact information difficulties then [Name of GO] should call the police as they are one of the partners.

The company is aware of how to access local agency contacts; this includes Local Safeguarding Partnerships across the country and how to access locally agreed inter-agency procedures and guidance. In addition, the company is aware of the non-emergency reporting procedures via the Local Authority's Children's Services relevant to the area or Multi-Agency Safeguarding Hub (MASH), or by telephoning the non-emergency Police number 101. For emergency situations, the company is aware of the need to contact the relevant police force for the area by dialling 999, this includes in Wales and Police Scotland.

The Local Authority Designated Officer (LADO) for each local area can be contacted via the relevant Local Safeguarding Partnership (LSP). Contact details for each LSP and LADO are available via the internet.

Contact details for LSPs in England and WASLES are available at:

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

<https://www.childprotectionuk.co.uk/local-safeguarding-children-boards-for-england-and-wales.php>

The company is aware that in Scotland, for a non-emergency referral or concern they can contact the local children's social work team. Their contact details can be found on the website for the local authority the child lives in, and in the table below. Alternatively they can contact the local office of Scottish Children's Reporter Administration:

<https://www.scra.gov.uk/contact-us/>

**Our local LSP in Kent is available at: <https://www.kscmp.org.uk/>**

**Our Kent LADO is available at: Telephone: 03000 41 08 88**

**Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)**

**If a call is urgent i.e a child is in immediate danger and requires safeguarding, call 03000 41 11 11.**

**If a call is urgent and outside of office hours call 03000 41 91 91.**

**For urgent cases, the police will be notified immediately via telephone number 999**

#### Useful Contacts.

**GIS 24 hour Emergency Telephone number: 0333 358 3598**

**GIS Director of Safeguarding & Designated Safeguarding Lead: Jonathan Sherry, [jonathan@gis-uk.com](mailto:jonathan@gis-uk.com) Tel: 07958420313**

**GIS Deputy Officer for Safeguarding: Paula Sherry, [paula@gis-uk.com](mailto: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](http://www.childline.org.uk)**

**<http://www.familylives.org.uk/> (Provides help and support to parents and carers).**

**NSPCC website.**

**[www.getsafeonline.org/safeguarding-children](http://www.getsafeonline.org/safeguarding-children)**

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