



Safeguarding Policy

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1. Introduction

My Guardians recognises its responsibility for Safeguarding and Child Protection. With this safeguarding policy, we promote the welfare of children and protect them from harm. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support and protection. We have duty of care to keep children safe and to look after the child's best interests. We undertake rigorous checks on all who work with us, all our personnel are DBS checked.

2. Definition of terms

Safeguarding and promoting the welfare of children refers to the process of protecting children from abuse or neglect, preventing the impairment of health or development, ensuring that children grow up

in circumstances consistent with the provision of safe and effective care and undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully.

Child protection refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm. For the purposes of this Policy, all references to **'child'** or **'children'** - whether singular or plural – are used to refer to students enrolled at a school or other educational institution in the United Kingdom who are in the care of My Guardians.

Guardianship personnel refers to any personnel at My Guardians, whether paid or unpaid, whether under a contract of service or apprenticeship, or otherwise than under a contract, who has responsibility for a child and may be interacting with children for or on behalf of My Guardians. This includes Homestay families and My Guardians drivers. The normal duties of guardianship personnel include caring for, supervising or being in sole charge of children; they also involve unsupervised contact with children under arrangements made by a responsible person.

3. Application of Safeguarding Policy

My Guardians widely promote this policy and procedures; it applies to all our personnel, including hosts and all members of their families, guardianship students and their parents and everyone else who comes into contact with My Guardians students. This policy reflects My Guardians position on safeguarding and what we do to keep our students safe. We expect that everyone who is working with My Guardians and involve with our students will follow the principals of this policy.

4. Purpose of Safeguarding Policy

- To provide protection for students who receive My Guardians services.
- To provide My Guardians personnel with guidance on procedures they should adopt in the event that they suspect a student may be at risk of harm.

5. Safeguarding Principles

We are safeguarding our students by:

- Listening to them, valuing and respecting them.
- Adopting child protection guidelines through procedures and a code of conduct for all guardianship personnel.
- Promoting the safety and wellbeing of our guardianship students.
- Recruiting staff and guardianship personnel safely, making sure all necessary checks made.
- Sharing information about child protection and good practice with parents, students and guardianship personnel.
- Sharing information about concerns with establishments evolved parents and students.
- Providing effective management for staff through supervision, support and training.
- Creating safe and secure environment for our students, protecting them from harm.
- Ensuring that our guardianship students have access to our 24-hour support line and know whom they should contact when needed.
- Appointing a DSL who is responsible for safeguarding and welfare of all our students.
- Ensuring that My Guardians personnel is provided with appropriate safeguarding training. Their duties are to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns.
- Ensuring that all personnel follow My Guardians policies and procedures relating to safeguarding and are aware of whom in My Guardians is responsible for safeguarding.
- Ensuring that the relevant persons are aware of the special needs or particular vulnerabilities of

- individual student.
- Ensuring action is taken in the event of concerns of abuse and support provided to the student.
- Ensuring that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.

6. Staff Roles & Responsibilities

Within My Guardians, the responsibility for safeguarding is with Managing Director Irina Bowman who takes care after welfare and pastoral matters of all guardianship students including placement to host families, induction and recording systems. She also is a Designated Safeguarding Lead (DSL) and has overall responsibility for the implementation of the safeguarding policy and is involved with any major decisions relating to safeguarding and child protection. She is trained in Safeguarding and Child Protection to the highest standard currently Level 3, which is renewed externally every 2 years.

- The Designated Safeguarding Lead & Managing Director is Irina Bowman: +44 (0) 7919425660.

7. Implementing Safeguarding Policy

Induction, training and awareness:

- New hosts have safeguarding procedures and their responsibilities included in their induction before they start to have contact with children.
- My Guardians Designated Safeguarding Lead trained to Level 3.
- My Guardians hosts of host families – online training at Level 1, discussions at the initial and further home visits, safeguarding updates via emails.
- Continuing training offered as necessary to update.

Monitoring and supervision:

- My Guardians actively monitors the use and application of the procedures. My Guardians homestay hosts are also asked about safeguarding issues and awareness when discussing their progress and reviewing their work.

Recording and information sharing:

- Accurate records are kept within the guidelines of our procedures. All records are kept confidentially and securely with limited access. Only the DSL can access the records.

Monitoring and Review:

- The policy will be reviewed every year, or earlier if changes in legislation or government guidance, if required by the Local Safeguarding partners, or because of any other significant change or event.

8. Child Protection Policy & Procedures

My Guardians is committed to safeguarding and child protection of its students and has in place Child Protection Procedures to support its guardianship personnel in putting into practice this commitment.

This policy establishes the roles and responsibilities of everyone who works for My Guardians in relation to the protection of students under the age of 18 years old whom their work brings them into contact. It is the responsibility of everyone at My Guardians to promote the protection of children and young people.

9. Principles of Best Practice

My Guardians personnel will:

- Treat guardianship students with care, dignity, respect and always act within the child's best interest.
- Recognise that those working for My Guardians will be perceived by students as trusted adults.
- Ensure communication with students is open, honest and clear.
- Assess the risks to students for all activities and operations.

Our Guardianship Duties & Responsibilities

Irina Bowman is the Designated Safeguarding Lead (DSL) and has responsibility for implementing My Guardians Child Protection Policy and ensuring appropriate training has been undertaken. The DSL is responsible for reporting any allegations of child abuse that occur.

10. Aims of Child Protection Policy

- All personnel must understand the responsibility placed on My Guardians for child protection.
- All personnel including host and all adults in the homestay have **a duty of care** to protect students from abuse, and this is part of our safeguarding children procedure.
- All personnel in the homestay household must understand their responsibilities in being alert to the signs of abuse and their responsibility for referring any concerns to the DSL.
- Not all concerns about students relate to abuse, however all information and concerns no matter how trivial they may seem must always be passed on to the DSL.
- If you are worried or concerned about a student, it is not your responsibility to investigate and decide if it is abuse. It is your responsibility to act on your concerns and to pass all information to the DSL.

11. Procedures

My Guardians will:

- Ensure it has a Designated person, who has undertaken the appropriate training.
- Ensure every member of My Guardians personnel knows that they have an individual responsibility for referring child protection concerns using the proper channels and within the timescales agreed with the Local Safeguarding Children Board; how to take forward those concerns where the designated person is unavailable.
- Ensure that guardianship personnel are aware of the need to be alert to signs of abuse and know how to respond to a pupil who may disclose abuse.
- Provide training for all staff so that they know: their personal responsibility; the agreed local procedures; the need to be vigilant in identifying cases of abuse; how to support a child who discloses abuse.
- Work to develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters.
- Keep written records of concerns about children (noting the date, event and action taken), even where there is no need to refer the matter to social services immediately.
- Ensure all records are kept secure and in locked locations.
- Ensure that recruitment and selection procedures are made in accordance with the statutory guidance 'Keeping children safe in education'.

12. Definition of Child Abuse

The definitions of abuse detailed below are those recommended as criteria throughout England and Wales by the Department of Health (DoH), the then Department for Education and Employment (DfEE) and

the Home Office in their joint document Working Together to Safeguard Children, it is also reflected in the statutory guidance for schools and colleges Keeping Children Safe in Education 2018:

Abuse and Neglect:

Somebody may abuse or neglect a child by inflicting harm, or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, a stranger. A child may suffer more than one category of abuse.

Child abuse includes abuse of a child by a member of the guardianship personnel or another adult, abuse at home which a child reports to one of the guardianship personnel, abuse by a stranger outside My Guardians and abuse of one child by another child.

Physical Abuse:

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

Sexual Abuse:

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Adult males do not solely perpetrate sexual abuse; women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue.

Emotional Abuse:

Persistent emotional ill treatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including 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, although it may occur alone.

Neglect:

Persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include

neglect of, or unresponsiveness to, a child's basic emotional needs.

Historical Abuse:

There may be occasions when a child will disclose abuse, which occurred in the past. This information needs to be treated in exactly the same way as a disclosure of current child abuse.

For other forms of child abuse, please refer to Appendix A

13. How to Recognise Signs of Child Abuse

Recognising abuse is one of the first steps in protecting children and young people. There could be signs or behaviour that make you feel concerned. All My Guardians personnel should be alert to the following types of behaviour in the children.

Signs of Child Abuse –The following signs may or may not be indicators that abuse has taken place, but the possibility should be considered.

Signs of possible physical abuse:

- Any injuries not consistent with the explanation given for them.
- Injuries, which occur to the body in places, which are not normally exposed to, fall or rough games.
- Injuries, which have not received medical attention.
- Reluctance to change for or participate in games or swimming.
- Bruises, bites, burns and fractures, which do not have an accidental explanation.
- The child gives inconsistent accounts for the cause of injuries.
- Frozen watchfulness.

Signs of possible sexual abuse:

- Any allegations made by a child concerning sexual abuse.
- The child has an excessive preoccupation with sexual matters and inappropriate knowledge of adult sexual behaviour for their age, or regularly engages in sexual play inappropriate for their age.
- Sexual activity through words, play or drawing.
- Repeated urinary infections or unexplained stomach pains.
- The child is sexually provocative or seductive with adults.
- Inappropriate bed-sharing arrangements at home.
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares which sometimes have overt or veiled sexual connotations
- Eating disorders such as anorexia or bulimia.

Signs of possible emotional abuse:

- Depression, aggression, extreme anxiety, changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy.
- Obsessions or phobias.
- Sudden underachievement or lack of concentration.
- Seeking adult attention and not mixing well with other children.
- Sleep or speech disorders.
- Negative statements about self.
- Highly aggressive or cruel to others.
- Extreme shyness or passivity.

- Running away, stealing and lying.

Signs of possible neglect:

- Dirty skin, body smells, unwashed, uncombed hair and untreated lice
- Clothing that is dirty, too big or small, or inappropriate for weather conditions
- Frequently left unsupervised or alone
- Frequent diarrhoea
- Frequent tiredness
- Untreated illnesses, infected cuts or physical complaints, which the carer does not respond to
- Frequently hungry
- Overeating junk food

For other signs of abuse please refer to Appendix A

14. How guardianship personnel should respond to suspicion of abuse

Any member of the guardianship personnel who is told of any incident or has strong suspicions of physical or sexual child abuse must report the information to the Designated Safeguarding Lead.

If a child or group of children disclose the fact that they are upset or worried, or if a child or group of children give the appearance of being upset, every effort should be made to keep the individual or group of individuals calm and to alleviate, as far as possible, any distress. It is not appropriate to try to force conversation whilst there is an emotive atmosphere. The individual(s) concerned should be taken to a private place where, if you feel the situation warrants it, a second responsible adult should be asked to be present.

The following guidelines should be observed:

- Confidentiality should never be guaranteed
- Questioning should be limited, and 'leading' questions should be avoided
- The matter should be referred immediately to the CPDP at My Guardians
- A written record of alleged abuse should be made as soon as possible
- An allegation of abuse should never be discounted because the alleged abuser is someone well known to and trusted by the individual to whom the disclosure has been made.

Allegations against under 18s years old

Children under the age of 18 years old facing an accusation of child abuse will need additional support, especially as their parents will be overseas. The Designated Safeguarding Lead will carry out a risk assessment and put an action plan in place for any child under 18 who has faced an allegation.

Allegations against a member of staff or volunteer

The Designated Safeguarding Lead must pass on concerns or allegation about a member of personnel or conduct if they have harmed or are at risk of harming children to the LADO (Local authority designated officer) of the county where the allegation took place. This must be undertaken within 24 hours of receiving the disclosure.

15. The role of the Designated Safeguarding Lead (DSL) and guardianship personnel

The Designated Safeguarding Lead takes specific responsibilities for child protection matters within My Guardians. At My Guardians Irina Bowman are Designated Safeguarding Lead and Prevent Lead and has responsibility for implementing Child Protection Policy and ensuring appropriate training undertaken. The

DSL is responsible for reporting any allegations of child abuse that occur.

Responsibility for ensuring Prevent Duty met, lies with Irina Bowman, Managing Director – the Lead Contact for the Prevent Strategy.

Full responsibilities include:

- Being conversant with all legislation including regulations relevant to the law of Child Protection
- Holding and being fully conversant with the Guidance and Regulations of the Children Act 2004, or any legislation subsequent to that Act
- Briefing guardianship personnel on the contents of the guidance and procedures and on the procedures, This includes the briefing of new guardianship personnel as part of their induction after joining My Guardians.
- Ensuring the procedures below followed within My Guardians.
- Liaison over child protection procedures with the Social Services Department
- Receiving reports of alleged or suspected child abuse, contacting the Social Services Department and taking other action in response, as set out below.
- Ensuring that all records of concern about a child, even if there is not a need to take any immediate action, are kept confidentially and securely
- Prevent Lead of My Guardians will be responsible for referring any concerns raise by its personnel that our guardianship student maybe at risk if radicalisation or involvement in terrorism to the Police Prevent Team.

My Guardians personnel should be aware of the need to report allegations or suspicions of child abuse to the relevant person at My Guardians. My Guardians will keep accurate records of alleged or suspected abuse, even if such abuse is only a minor incident.

16. Lines of communication

There should be, at all times, routine contact between the guardianship personnel and the child, as a preventative measures against child abuse.

Allegations of abuse made by a child will be reported, as follows:

- A child should speak to a member of the guardianship personnel
- If the alleged abuser is one of the guardianship personnel, the child should know that the first port of call is the Designated Safeguarding Lead at My Guardians
- If the alleged abuser is the Designated Safeguarding Lead Person at My Guardians, the child should initially report it to another member of the guardianship personnel. The guardianship personnel should then report the matter to the Social Services Department.

Parents, in a similar way, should report alleged abuse to one of the guardianship personnel or the Designated Safeguarding Lead at My Guardians depending on who the alleged abuser is.

If anyone other than the DSL makes the referral, he or she should inform the DSL as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

17. Confidentiality and sharing information

Confidentiality issues need to be understood if a student divulges information they are being abused. A student may only feel confident to confide in a member of staff if they feel that the information will not be divulged to anyone else. However, My Guardians personnel have a professional responsibility to share relevant information about the protection of children with the designated statutory agencies when a child is experiencing child welfare concerns.

It is important that each member of staff deals with this sensitively and explains to the child that they must inform the appropriate people who can help the child, but that they will only tell those who need to know in order to be able to help. Be aware that it may well have taken significant courage on their part to disclose the information and that they may also be experiencing conflicting emotions, involving feelings of guilt, embarrassment, disloyalty (if the abuser is someone close) and hurt.

Sharing information:

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the Designated Person. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with Data Protection Act 1998 principles. Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

18. Note for parents and guardianship students

Note for parents:

Parents should be aware that My Guardians have a responsibility to ensure the wellbeing of all children in our care. This responsibility means that My Guardians:

- Will have a child protection policy and procedures;
- Should make parents aware of its child protection policy, and that it may require their child to be referred to the statutory welfare agencies if they believe that the child or other children may be at risk of significant harm;
- Should endeavour to work with parents and schools regarding the welfare of their child and remain impartial if their child is being, or has been referred;
- Should help parents and schools to understand that if a referral is made to social services or the police, it has been made in the best interests of the child and that My Guardians will be involved in any child protection enquiry or police investigation in relation to their child's welfare and educational progress;
- Keep the parents informed of the welfare and educational progress of the child.
- We will always be in contact and inform school on wellbeing of our students, when required.

Where a professional has a concern about a child, they will seek, in general, to discuss this with the family and with school, and where possible, seek their agreement to making a referral to social services. However, this should only be done where such a discussion and agreement will not place a child at increased risk of significant harm. Advice will be provided by the local social services department in consultation, where appropriate, with the police.

The designated child protection person at My Guardians should clarify with these statutory agencies, when, how and by whom, the parents will be told about any referral. They should also seek advice as to whether or not the child should be informed of the process.

Parents may sometimes feel alone but usually there is always someone they can speak. Caring for children is not always easy and if you are struggling to cope you may need to ask for help and support to protect your child.

As a parent, you may find the following helpful:

- Make time to talk and listen to your child;
- Familiarise yourself with your child's friends and routine;
- Be sensitive to changes in behaviour;
- Teach your child to feel confident to refuse to do anything they feel is wrong;
- Be aware of your child's use of the Internet and mobile phone to ensure they do not place themselves at risk.

Note for students:

If someone is hurting you or your friends, there are people who can help you and stop people from making you feel scared or hurt. You should tell someone you trust:

- You can tell your guardian, your host family, teacher at school, parents, grandparents or other members of your family who may be able to help, or can tell a friend;
- Let people help to make things better by stopping the person from hurting you or your friends.

The person at My Guardians who has special responsibility for helping you if someone is hurting you or your friends is Mrs Irina Bowman.

19. Your Safeguarding & Child Protection Contacts

Designated Safeguarding Lead & Prevent Lead:

At My Guardians, person responsible for child protection is Irina Bowman, position: Designated Safeguarding Lead & Prevent Lead for My Guardians. Telephone: +44 (0) 7919425660, email: info@myguardians.co.uk. You should call the Designated Safeguarding Lead first to report an issue.

Responsibility for ensuring Prevent Duty is met lies with Irina Bowman – the Lead Contact for the Prevent Strategy.

If you think, a child is in immediate danger:

Contact the police by calling 999, otherwise, call 101 & ask for the Safeguarding Coordination Unit. If you suspect that a child may be abused or neglected, it is vital you report your concerns so that this can be investigated. Contact Kent and Medway Safeguarding Children Board on phone number 0300 0411 111.

National contacts

Crimestoppers phone number: 0800 555 111 www.crimestoppers-uk.org. Childline: 0800 1111. Kidscape Bullying Helpline 0207 730 3300. Children's Commissioner Anne Longfield 0800 528 0731 advice.team@childrenscommissioner.gsi.gov.uk

Support and advice:

NSPCC 24 hour helpline: 0800 800 5000 (free from a landline). NSPCC Text helpline: 88858 (service is free and anonymous). Address: NSPCC Weston House, 42 Curtain Road, EC2A 3NH.

NSPCC Whistleblowing Helpline: 0800 028 0285 CHILDLINE provides help and advice for children and young people help@nspcc.org.uk

Further Information

For information about all aspects of Child Protection, including more advice on what to do if you are worried about a child, visit: www.nspcc.org.uk (National Association for the Prevention of Cruelty to Children). They provide a free 24-hour helpline where you can discuss your concerns with a counsellor. You can call the NSPCC on 0808 800 5000 or email: help@nspcc.org.uk

Consulting with Children's Services or the NSPCC

If you are not happy or satisfied with the response from My Guardians personnel or the Designated Safeguarding Lead you are able to contact your local authority or the NSPCC directly to pass on your concerns.

You can also contact your local authority directly if a child discloses information or you have concerns about the Designated Safeguarding Leads or a member of staff. You will find contact details for your local Children's Social Care Referral and Assessment Team online. The details will be on your Local Council website or if you are unsure please go to <https://gov.uk/report-child-abuse-to-local-council> and enter your postcode. You will then be given the appropriate contact details. Alternatively, contact the Designated Safeguarding Lead who will provide you with relevant contact details.

NSPCC

The NSPCC whistleblowing helpline is available as an alternative route for personnel that do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by a school or college. Staff can call 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday and email: help@nspcc.org.uk12

For further information on My Guardians Whistleblowing Procedures, please refer to Appendix 2 - My Guardians Whistleblowing Policy.

20. Complaints, concerns & false alarms

The CPDP needs to ensure that key people who deal with complaints and concerns are fully aware of this policy document and that there is the possibility of certain complaints understating an allegation of abuse and therefore any such complaints should be routed via the appropriate channels.

It is important to realise that the Children Act will inevitably lead to some investigations being triggered that do not substantiate the allegations made, as well as those that do. It is a basic assumption that it is better to accept some false alarms than to fail to initiate the specialist investigation of instances of real abuse. The Social Service Department will work with the Manager of My Guardians, guardianship personnel, parents and children involved in any false alarm investigation to assist in recovery from the incident, as well as working with My Guardians to assist in 'living through' and recovering from a substantial investigation.

21. Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where adults fail to do so. All adults involved in My Guardians' provision of care should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of other adults.

Inappropriate conduct includes, but is not confined to:

- Bullying or humiliation,
- Contravening health and safety guidelines,
- Serious breaches of My Guardians code of ethical practice,
- Professional practice that falls short of normally accepted standards,
- Compromising pupils' welfare but in a way that does not meet the threshold for child protection intervention.

Reasons for blowing the whistle:

Staff will naturally be reticent to report a concern about the conduct of a colleague. However, each individual must take responsibility for ensuring that pupils are fairly treated. If poor practice is allowed to continue unchecked, it could escalate with serious consequences.

Your action not only protects pupils, but also deters any suggestion that you have colluded with poor practice that you knew was occurring but chose to ignore.

22. Implementation and Monitoring:

- My Guardians will appoint a person with responsibility for child protection and safeguarding known as the Designated Safeguarding Lead (DSL)
- This person will receive reports from teachers, homestay hosts and/or staff of any occasions when there are concerns or issues of Child Protection. These reports will be filed and kept securely by the Designated Safeguarding Lead (DSL) for 5 years. Only the DSL and their deputy will have access to these records.
- My Guardians will review this policy annually to ensure it is being implemented. Appropriate action will be taken if deemed necessary, through consultation with the agencies referred to below.

23. Professional Code of Conduct:

All My Guardians personnel should:

- Place the safety and welfare of pupils above all other considerations;
- Treat all children, parents and colleagues with consideration and respect
- Adhere to the principles and procedures contained in the policies in our safeguarding portfolio
- Treat each child as an individual and make adjustments to meet individual need
- Demonstrate a clear understanding of and commitment to non-discriminatory practice
- Be alert to, and report appropriately, any behaviour that may indicate that a child is at risk of harm
- Never condone inappropriate behaviour by children or staff
- Take responsibility for their continuing professional development.

Good practice includes:

- Setting a good example by conducting ourselves appropriately,
- Encouraging positive and safe behaviour among pupils,

- Being a good listener,
- Being alert to changes in pupils' behaviour,
- Recognising that challenging behaviour may be an indicator of abuse,
- Reading and understanding My Guardians Child Protection Policy and guidance documents on wider safeguarding issues.
- Being aware that the personal and family circumstances and lifestyles of some pupils may lead to an increased risk of abuse.

Advice on one-to-one contact with children:

Guardianship personnel should be wary of placing themselves in situations where they are open to accusations of inappropriate conduct. Essentially this involves exercising common sense.

- If in conversation with a child in a room or a car, for example, a respectful distance should be observed. Guardianship personnel or a member of their household should never be alone with the child in the bedroom with a closed door. If guardianship personnel or an adult member of their family is involved in corrective and personal guidance of a child, it is advisable to take precautions. For instance, if inside the house, by leaving the door to the room open, remaining seated at a reasonable distance from the child, ensuring there is a witness when appropriate or that there is another responsible adult in the house where possible.
- It is not wise to invite a single child into a bedroom or bathroom.
- On occasions, it will be unavoidable that a single child will be transported in a member of the guardianship personnel's personal vehicle. It is prudent on such occasions to ensure that the child passenger sits on the rear seat to reduce the possibility of accidental contact, which might be misconstrued.
- It is good advice not to make physical contact with a child. This is most important advice in a one-to-one situation between a member of the guardianship personnel and a child.
- Guardianship personnel should note that, in one-to-one discussions, confidentiality should not be promised to the child.
- Exclusively intimate situations with a child that could either arouse undue suspicion or lead to misinterpretation and false allegations should be avoided.

24. Recruitment and screening

My Guardians should make all guardianship personnel aware of our Child Protection Policy. Guardianship personnel should be asked to sign a Child Protection declaration. My Guardians will take two references as to the character and suitability of any person under their control and their suitability to have contact with a child.

All applicant guardianship personnel must declare any history, criminal or civil, of child abuse. Enhanced Criminal Records Bureau checks must be sought to confirm this. Permission to interact with children is dependent upon a judgment of these declarations and the results of an enhanced CRB check.

When using outsourced services (e.g. taxi firms) whose personnel may have contact with a child, My Guardians will obtain a written assurance from the service provider that all such personnel have been subjected to enhanced Criminal Records Bureau checks (CRB checks) and other relevant checks.

End of Safeguarding & Child Protection Policy

Additional forms of abuse and safeguarding issues

This section contains important additional information about specific forms of abuse and safeguarding issues. If personnel have any concerns about a child's welfare, they should act on them immediately. They should follow My Guardians Safeguarding Policy and speak to the designated safeguarding lead. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) made immediately.

Information on serious violent crime:

All guardianship personnel need to know the indicators that may signal that children are at risk from, or are involved with, serious violent crime. Including:

- Unexplained gifts or new possessions. These can indicate children have been approached by or involved with individuals associated with criminal networks or gangs
- Increased absence from school
- Change in friendship or relationships with others or groups
- Significant decline in performance
- Signs of self-harm, significant change in wellbeing
- Signs of assault or unexplained injuries.

Guardianship personnel should also be aware of the associated risks and understand the measures in place to manage them.

Child sexual exploitation:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual and not always involve physical contact: it can also occur by use of technology.

Like all forms of child sex abuse, child sexual exploitation:

- Can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex
- Can still be abuse even if the sexual activity appears consensual
- Can include both contact and non-contact sexual activity
- Can take place in person or via technology, or a combination of both
- Can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence
- May occur without the child or young person's immediate knowledge. For example, through others copying videos or images they have created and posted on social media
- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organized abuse is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional well-being
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss school or education or do not take part in education.

Child criminal exploitation:

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

Key to identifying potential involvement in **county lines** are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years
- Can affect any vulnerable adult over the age of 18 years
- Can still be exploitation even if the activity appears consensual
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Preventing radicalisation:

Children are vulnerable to extremist ideology and radicalisation.

Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. You can find more information in our Anti-Radicalisation-Prevent Duty Policy.

Human Trafficking

Both children and adults can be trafficked into the United Kingdom for different forms of exploitation, examples of this range from forced prostitution, forced labour, forced criminality, benefit fraud, forced marriage, forced servitude and potentially forced organ removal. Trafficking however does not need to take place across international borders; simply bringing a human into an exploitative situation constitutes trafficking. Many children who are trafficked from overseas come from Eastern Europe, South-East Asia and Africa. Often children are forced to work in agriculture, the sex industry, in nail bars, car washes, restaurants or cannabis farms. Children can also be exploited to carry drugs and firearms across borders for criminal gangs. Traffickers may groom the child parents to gain their trust, promising the parents a better life and future for their child. Often the traffickers will ask parents for large sums of money upfront in return for

travel documents, visas, education and transport. Traffickers will also make a profit on what the child “earns” through exploitation, crime and forced labour. Children will often be told that they need to pay off a debt for their family. There has been a number of cases since 2015 of traffickers, trafficking students from Vietnam to UK boarding schools/colleges. Children are granted their visa, attend for the first term and then go missing from their education. Staff should pay particular attention if they receive a course or guardianship enquiry for a student of any age from Vietnam, Albania and Romania and this information should be passed onto the Designated Safeguarding Lead or their deputy at the time of the enquiry. All staff and volunteers need to be aware of human trafficking and suspected cases should be dealt with as any other safeguarding issue. All suspected cases of human trafficking or modern slavery, will be reported to the Modern Slavery Helpline on 08000 121 700 or the police on 101.

Sexual Violence and Sexual Harassment

Sexual Violence refers to the sexual offences under the Sexual Offences Act 2003 and includes rape, assault by penetration and sexual assault.

Sexual harassment is defined as any behaviour in a sexual context which is unwanted and can include sexual exploitation, unwanted sexual remarks on social media, groping, flicking bras, sexual comments, making up sexual stories, making sexual remarks about clothing, deliberately touching another person or brushing against them, drawing sexual pictures, requesting sexual favours or making sexual jokes.

Sexual violence and harassment is never acceptable and should never be treated as a joke or “just banter” between adults, children or children and adults of any age. Any incidences will be dealt with in accordance with this policy and any information regarding the above will be passed on to the police.

Peer on Peer Abuse

Children can abuse other children. We acknowledge that Peer on peer abuse can occur at any age and other Safeguarding issues can manifest themselves via peer on peer abuse. My Guardians make it clear that any kind of abuse will not be tolerated and peer on peer abuse will not be dismissed as “banter” or seen as an inevitable part of growing up. Peer on Peer abuse is no different to any other form of abuse and must be dealt with as any other safeguarding issue.

Peer on peer abuse could happen within our organisation and may include but is not restricted to the following:

- Bullying (including cyber-bullying); Please see Appendix Bulling including Cyber-bullying and E-safety Guidelines
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Sexual violence and sexual harassment
- Forced drug taking
- Sexting (also known as youth produced sexual imagery)
- Initiation/hazing type violence and rituals. Please see below.

Sexting - ‘Sexting’ is the exchange of self-generated sexually explicit images, through mobile picture messages or webcams over the Internet. Young people may also call it: “Cybersex” or “sending a nudie”, or “dick pic”. ‘Sexting’ is often seen as flirting by children and young people who feel that it is part of normal life. It may be common but ‘sexting’ is illegal. By sending an explicit image, a young person is producing and distributing child abuse images and risks being prosecuted, even if the picture is taken and shared with their permission. When images are stored or shared online they become public. They can be deleted on social media or may only last a few seconds on apps like Snapchat, but images can still be saved or copied by others. These images may never be completely removed and could be found in the future, for example when applying for jobs or university. Young people may think ‘sexting’ is harmless but it can leave them vulnerable

to:

- Blackmail - An offender may threaten to share the pictures with the child's family and friends unless the child sends money or more images
- Bullying - If images are shared with their peers or in school, the child may be bullied. Unwanted attention - Images posted online can attract the attention of sex offenders, who know how to search for, collect and modify images
- Emotional distress - Children can feel embarrassed and humiliated. If they are very distressed this could lead to suicide or self-harm.

My Guardians are committed to helping young people to use privacy settings, to block inappropriate people, remove content they have shared online and to report offensive and inappropriate content, which other people have posted to get it removed. Please report all incidences to the Designated Safeguarding Lead.

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include: • Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; • Being more prone to peer group isolation than other children; • The potential for children with SEN and disabilities being disproportionately impacted • By behaviours such as bullying, without outwardly showing any signs; and • Communication barriers and difficulties in overcoming these barriers. To address these additional challenges, we would engage the school to consider extra pastoral support for children with SEN and disabilities and consideration of the most appropriate homestay to support them.

Initiation/hazing violence and rituals

My Guardians personnel may have their suspicions raised if a child discloses an incident, which has happened to them or a friend.

It may have happened to them in their home country or in the UK. There have been reported cases of initiation activities taking place in boarding houses and sports teams within the UK.

Situations may include but are limited to, pupils being asked to complete dares, pretending to capture or kidnap other pupils, removing items of clothing, being branded, forced consumption/ingestion of spicy foods, alcohol, drugs or other harmful substances etc., whipping, hitting or burning, public nudity, mistreatment of animals, forced sexual activity, self-harm and shaving parts of the body.

Disclosures of Initiation/hazing violence and rituals should be dealt with the same as any other disclosure of abuse and passed on to the Designated Safeguarding Lead.

Upskirting

Upskirting is now a form of peer-on-peer abuse. It is a criminal offence. Upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds which can be found on the gov.uk website.

The guides explain each step of the process, support, and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements

information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers).

Children missing from education

All guardianship personnel should be aware that children going missing, particularly repeatedly, could act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, and risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Guardianship personnel should be aware of their school's or homestay's unauthorised absence and children missing from education procedures.

Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Domestic abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: • psychological; • physical; • sexual; • financial; and • emotional Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, children may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Advice on identifying children who are affected by domestic abuse and how they can be helped is available at: National crime agency human-trafficking NSPCC- UK domestic-abuse Signs Symptoms Effects Refuge what is domestic violence/effects of domestic violence on children Safe lives: young people and domestic abuse

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

So-called 'honour-based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes, which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of these dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV. Actions if staff has a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Female Genital Mutilation (FGM)

FGM is a form of child abuse and as such is dealt with under My Guardians Child Protection policy.

FGM is a grave violation of the human rights of girls and women. 'Female Genital Mutilation (FGM) comprises all procedures that involve partial or total removal of the external female genitalia or other injury to the female genital organs for non-medical reasons' – definition supplied by the World Health Organisation (2018).

Suspicious should be raised after a child has had a prolonged absence from school together with noticeable behaviour change. This could be after a return from a holiday or you may notice a child is spending long periods away from school. In conversation, a child may talk about and express anxiety about a special ceremony or they may be worried about returning to their home country when their school term has finished.

A child is at risk of FGM if they come from a community that is known to practice FGM. Countries where FGM is most commonly practiced include Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria and Eritrea. However, girls from non-African communities that are also at risk include those from Yemen, Indonesia, Pakistan and Kurdish nationals.

A child who has undergone or who is at risk of FGM should be seen as a child protection issue and advice should be sought from the Designated Safeguarding Lead who will make a referral to Social Services/local safeguarding partners and the Police.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Absence of full and free consent can be if a person does not consent or if they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, with pages 35-36 of which focus on the role of schools and colleges. Staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk

Safer Recruitment Policy

This policy has been developed for safer recruitment practices and procedures throughout My Guardians and to support the creation of a safer culture by reinforcing the safeguarding and well being of our guardianship students. We aim to ensure that the students in our care at all times experience a caring and secure environment. In pursuit of this aim, My Guardians undertakes the following:

1. *DBS checks*

- My Guardians undertakes Enhanced DBS checks with barring on all its employees, including all adult members of host families aged sixteen years and over.
- Written permission is first sought and obtained from all employees and host families for such checks.
- A written assurance from taxi companies is obtained, confirming that all taxi drivers providing transfers to our students have been subjected to enhanced Criminal Records Bureau checks (CRB checks) and other relevant checks are done.
- A central system for recording safer recruitment checks is established and maintained.

2. *Safeguarding and Child Protection Training*

- My Guardians has a Child Protection Designated Person, who have received Level 3 Safeguarding Training and has responsibility for responding to Child Protection concerns raised by other guardianship personnel, parents or students.
- All other Guardianship Personnel, including hosts in homestay families receive Basic Awareness Training (Level 1 Safeguarding).
- All staff is retrained annually.

3. *Homestay Families Recruitment and Supervision*

Before engaging the host family, My Guardians undertakes rigorous vetting procedures, which include the following:

- 1.1. The host family fills out Homestay Registration Form.
- 1.2. Safer recruitment interview and assessment always conducted.

My Guardians arranges a meeting with the host family in its home and undertakes a formal interview and assessment for hosting students. During the visit, the assessor asks to show around the house as well as around the exterior of the property and garden. Notes about the accommodation, facilities and garden always taken.

The assessor confirms with the host that all details on the initial registration form are correct, up to date and accurate.

The assessor asks to see the following documents and record the details of these documents on the assessment form.

- a) Passport or Driving Licence: name on passport; date of birth; date of issue; date of expiry, passport number.
- b) Utility bill – current, within the last three months.
- c) Household insurance - date of issue and expiry date.
- d) Car insurance - date of issue and expiry date.

e) Gas safety certificate provided by an engineer who is 'Gas Safe' registered and expiry date.

4. *Host Family Interview:*

During the interview, the assessor asks questions relating to:

- Reasons for becoming a host family and previous experience
- Its attitude to hosting a student
- Its response to sickness, an emergency or bad behaviour
- Host's attitude to, and knowledge of safeguarding and child protection
- House rules
- Alcohol, smoking, substance abuse
- Electrical and gas safety
- Meals
- Use of the telephone, IT and Internet
- Laundry
- Transport

All responses to those questions are formally recorded. Detailed notes are kept of all staff and homestay interviews. We have a secure and efficient method for holding records.

- 1.3. Providing the interview is satisfactory, the assessor undertakes Enhanced Disclosure Barring Service Checks with barring on all host family members aged over sixteen years living in the household. Details of the person who undertook the checking and the date when the checks were completed are recorded.

Two written references, (one professional, one personal and from people who have known the Primary Host for over two years within the last five years) and a follow-up telephone call to each, are made. Additionally, My Guardians request the personal referee to provide either a current passport or driving licence, thereby confirming proof of identity.

Details relating to the verification of references are as follows:

Once the references have been received, My Guardians will verify the source of the reference. If concerns are raised within the reference, My Guardians will address these by telephoning the referee, so any further questions can be asked. A log of the call will be placed on file. The references will be retained on file for the duration of contract/employment and then an agreed period of time afterward, normally 5-7 years. My Guardians shall check that information provided in references is not contradictory or incomplete. On receipt, references will be checked to ensure that all specific questions have been answered satisfactorily. The referee will be contacted to provide further clarification as appropriate, for example if the answers are vague or if insufficient information is provided. They will also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies will be taken up with the candidate.

- 1.4. Online Basic Awareness Training with Local Safeguarding Children Board is organised for Primary Carer of host family.
- 1.5. Subject to successful safeguarding checks, the contract between My Guardians and host family is signed and dated and copies kept by both parties demonstrating the host family commitment to the agreement and acceptance of its responsibilities.
- 1.6. My Guardians provides host families with Homestay Handbook, which includes guidance on looking after students and the standards expected for the accommodation, meals and facilities provided. Safeguarding Policy and a Complaints Procedure are sent to host at same time.

5. Recruitment and Appointment of Staff

The wording of the advertisement will include: My Guardians is committed to safeguarding and promoting the welfare of children, and applicants must be willing to undergo Child Protection screening appropriate to the post, including checks with past employers and the Criminal Records Bureau.

Notes to accompany the application form.

Applications will only be accepted from candidates completing the application form in full. With the application form, please send an enclosed letter of application and full curriculum vitae.

Applicants should be aware that all posts at My Guardians involve some degree of responsibility for safeguarding children. Accordingly, this post is exempt from the Rehabilitation of Offenders Act 1974, and therefore all convictions, cautions and bind-overs, including those regarded as “spent”, must be declared.

Before interview, we shall seek references on shortlisted candidates and may approach any previous employers for information to verify experience or qualifications.

Applicants should be aware that provision of false material is an offence and could result in an application being rejected. Applicants are asked to be aware that the interviews will include discussion of their suitability to work with children.

All candidates invited to interview must bring documents confirming any educational and professional qualifications necessary or relevant for the post. Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained from the awarding body. All candidates invited to interview must also bring with them a valid driving licence or Passport and Utility bill.

Whistleblowing Policy

Introduction

All My Guardians personnel have a responsibility for raising concerns about unacceptable practice or behaviour in order to prevent the problem become worse. We value and protect personnel who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.

We provide training to our personnel about raising concerns and how we follow up their concerns. We explain our whistleblowing policy as part of their induction process.

Whistleblowing has a key role to play in safeguarding children. My Guardians recognise that students cannot be expected to raise concerns in an environment where adults fail to do so. All adults involved in My Guardians' provision of care should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of other adults.

Inappropriate conduct includes, but is not confined to:

- Bullying or humiliation
- Contravening health and safety guidelines
- Serious breaches of My Guardians code of ethical practice
- Professional practice that falls short of normally accepted standards
- Compromising students' welfare but in a way that does not meet the threshold for child protection intervention.

How whistleblowing is protected

Law protects everyone who report any of the following:

- A criminal offence, e.g. fraud
- Someone's health and safety is in danger
- Risk or actual damage to the environment
- A miscarriage of justice
- The company is breaking the law, e.g. doesn't have the right insurance
- You believe someone is covering up wrongdoing. The wrongdoing you disclose must be in the public interest.

Personal grievances, e.g. bullying, harassment, discrimination, are not covered by whistleblowing law, unless a particular case is in the public interest or a person is whistleblowing about another individual.

'Concerns' will usually be something you have seen at work - though not always. The wrongdoing you disclose must be in the public interest. This means it must affect others, e.g. the public. As a whistle-blower you are protected by law - you should not be treated unfairly or lose your job because you 'blow the whistle'. You can raise your concern at any time about an incident that happened in the past, is happening now or you believing will happen in the near future.

My Guardians encourages all its personnel, in order to protect and reduce risks to others, whistleblowing in the following instances, in addition to the above:

- Where an act is against My Guardians policies and procedures
- Where an act is below My Guardians standards
- Where an act is against My Guardians Codes of Conduct.

Reasons for blowing the whistle

Staff will naturally be reticent to report a concern about the conduct of a colleague. However, each individual must take responsibility for ensuring that pupils are fairly treated. If poor practice is allowed to continue unchecked, it could escalate with serious consequences.

Your action not only protects pupils, but also deters any suggestion that you have colluded with poor practice that you knew was occurring but chose to ignore.

Where personnel have concerns, they should firstly report it internally before using an external prescribed body. Making a report to an external person may only be undertaken where the personnel thinks My Guardians will cover the matter up, would treat them unfairly if they complained or have raised the matter before, but the concern hasn't been dealt with.

Making your claim anonymously or confidentially.

You can tell DSL at My Guardians or a prescribed body anonymously but they may not be able to take the claim further if you have not provided all the information they need. You can give your name but request confidentiality - the person or body you tell should make every effort to protect your identity. If you report your concern to the media, in most cases you will lose your whistleblowing law rights.

Who to tell and what to expect

The procedures should be as follows:

- You can report your concerns to the Designated Safeguarding Lead (DSL) at My Guardians, Irina Bowman, telephone 07919425660 or email to info@myguardians.co.uk
- If appropriate, the DSL will inform the LADO in relation to issues regarding safeguarding of children or if necessary local authority department/governing body for issues not in relation to child safeguarding.
- There are other options if you do not want to report your concern to My Guardians, e.g. you can get legal advice from a lawyer, or tell a prescribed body such as AEGIS. If your concern is regarding the treatment of a child, you can contact the NSPCC.
- The NSPCC has a whistleblowing helpline, which is available for staffs that do not feel able to raise concerns regarding child protection failures within the organisation (My Guardians). Staff can call 0800 028 0285 between 8am and 8pm Monday to Friday or can email: help@nspcc.org.uk

Support and advice:

NSPCC Whistleblowing Helpline: 0800 028 0285 Childline provides help and advice for children and young people. Email: help@nspcc.org.uk

Protect: 020 3117 2520 for free, confidential whistleblowing advice.

Website: www.pcaw.co.uk

Process when whistleblowing received

Designated Safeguarding Lead at My Guardians will carry out a prompt and thorough investigation.

Concerns should be put in writing, including the following information:

- Details of the concern raised under the whistleblowing policy
- Background and history of the concern
- Names, dates and places where possible
- Reasons why there is concern about the particular situation
- Your name and contact details. Alternatively, you may act anonymously.

If for any reason the concern cannot be put in writing, then phone call or meeting with DSL will be

arranged. Though personnel making the allegation will not be expected to prove the truth of any allegation, they will need to demonstrate to DSL that there are sufficient grounds for their concern.

The earlier a concern is raised, the easier and sooner it is possible for My Guardians to act.

What My Guardians or a prescribed body will do

After a concern received, My Guardians will:

- Provide support to person who raised it.
- Provide transparency and accountability during the course of investigation.
- Ensure there is an external review if appropriate.
- Update the person who raised the concern on progress of any investigations.
- Take action to protect this person from any inappropriate actions, e.g. harassments.
- Provide mediation and dispute resolution if appropriate.
- Do our best to protect the staff members' identity if they do not want their name disclosed.
- Will not take action against the member of staff raising the concern if raised in good faith that is later confirmed to be unfounded.

DSL at My Guardians will make initial enquiries, following a meeting with the member of staff making the allegation, to decide whether an investigation is required and what should be done.

The concern raised may:

- Simply be resolved without the need for further investigation
- Involve an internal investigation by DSL at My Guardians
- Be referred to the Local Authority Designated Officer (LADO) for advice
- Be referred to the Police
- Form the subject of an independent inquiry.

Some concerns might be covered by our other policies and procedures and will be addressed under those procedures, e.g. disciplinary procedures.

Within ten working days of a concern being received, DSL will send the member of personnel a written response detailing:

- Acknowledgement of the allegation in writing
- Indication of how My Guardians propose to deal with the matter
- An estimate of how long it will take to provide a final response
- An indication of whether any initial enquiries have been made
- Indication whether further investigations will take place and if not, why not

All cases of whistleblowing will be recorded and kept on My Guardians files.

Further information and advice can be found here: <https://www.gov.uk/whistleblowing>

Data Protection Policy & Privacy Notice

Information Sharing & Data Protection for guardianship students

Confidentiality and sharing information

Confidentiality issues need to be understood if a student divulges information they are being abused. A student may only feel confident to confide in a member of staff if they feel that the information will not be divulged to anyone else. However, My Guardians personnel have a professional responsibility to share relevant information about the protection of children with the designated statutory agencies when a child is experiencing child welfare concerns.

It is important that each member of staff deals with this sensitively and explains to the child that they must inform the appropriate people who can help the child, but that they will only tell those who need to know in order to be able to help. Be aware that it may well have taken significant courage on their part to disclose the information and that they may also be experiencing conflicting emotions, involving feelings of guilt, embarrassment, disloyalty (if the abuser is someone close) and hurt.

Sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff should only discuss concerns with the Designated Person. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with Data Protection Act 1998 principles.

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

This Data Protection Policy & Privacy Notice applies to our guardianship services we offer to international students under the age of 18 years old.

The protection of privacy and personal information of our guardianship students is important to us. We make sure that not only do we have appropriate security measures in place, but that any other organisation we work with to provide a service also meets the same standard as us.

- We will make it clear at the point we request your information why we are collecting it and how we are going to use it.
- We will collect and use your personal information only if we have your permission or we have sensible reasons for doing so, such as collecting sufficient information from parents about this child in order to fulfil our guardianship duties.
- We will minimize the amount of information we collect from you to what we need to deliver our services.
- We will be clear in our dealings with you as to what information about you we will collect and how we will use it.
- We will use personal information only for the purposes for which it was originally collected and we will delete it securely when you request this or after a clearly defined timescale.

- Our website and social media channels are accessible via the Internet. Please remember that if you post any comments or links on any of our sites that they can be read and accessed by anyone and everyone.

What information do we collect about you and how do we use it?

- When you contact us for information.
- When you work with us as a host family, taxi driver or other guardianship personnel, if you are our partner school, student or parents.
- If you choose our guardianship services.
- When you use the website.
- If you choose to reveal information in emails or by posting on social media.

What information do we store?

We store the following information about our students, host families and members of staff as a Data Controller.

Students

- Information you supply on booking and registration forms and safeguarding forms as our guardianship students.
- Feedback from you.
- Records of meetings, email, telephone and paper correspondence.
- Photographs you send us.

Host Families

- Information you supply on application and registration forms.
- Photographs you provide for your host family profile.
- Confidential written references from referees supplied by you.
- Interview notes, home visit notes and records of observations.
- Information supplied by the DBS.
- Feedback from students.
- Feedback from you.
- Banking information for the purpose of transferring fees to you.
- Records of meetings, email, telephone and paper correspondence.
- Information you supply on application forms and on CVs.
- Confidential written references from referees supplied by you.
- Information supplied by the DBS (if applicable)

The minimum information we will need from you to register for our email newsletters is your name and email address. We will process data collected for this purpose based on Legitimate Interest to deliver the service for which you have registered. On this basis, we will also contact you occasionally about other relevant services we offer, which we think will interest you. You always have a choice and can opt out of processing on this basis at any time by contacting our Database Manager by email or telephone:

How long do we keep your data?

Because we collect data for a wide range of purposes, we do not have a singularly defined retention period. For each individual service, we define a carefully assessed timeframe within which we retain your data. After this, data is managed to ensure that it is either erased from our system or minimised and retained for legal reasons.

Updating your personal information

Under current data privacy legislation, you have the right to rectify, erase or restrict the processing of your data without undue delay. You may also request access to the data we hold on you. To do this, or to update your personal information at any time, please contact our Database Manager:

Email address info@myguardians.co.uk phone +44 (0) 7919425660.

Whom do we share data?

Your information may be shared with our partner schools, host families, students, taxis, travel companies or other services necessary for our business operations.

My Guardians will also share your information, including contact details, with the AEGIS office and lead and supporting inspectors for the purposes of an (re) accreditation inspection within their privacy notice and data protection policy, with the relevant permissions and in line with the ICO data protection principles.

These parties are responsible for the security of this data, will not use your data for any other purpose except the purpose for which it was provided, and will not share your data with any third parties.

We will not share your personal information with others for marketing purposes.

Legal information and how to contact us

Under the currently applicable laws we have to say who the data controller is for My Guardians services. The data controller is the organisation responsible for protecting information and, in our case is My Guardians Ltd.

Data Protection Officer: Mrs Irina Bowman, telephone 07919425660, info@myguardians.co.uk

Access to your information

If you would like access to or a copy of the personal information we hold about you, to request a correction, or have any questions about how we may use it or to make a complaint, please contact the Data Manager by email or by telephone.

Requests will be dealt with by the Data Manager, and will be responded to within a reasonable period, not longer than 30 days.

If you are not satisfied with the way your request was handled, you have the right to lodge a complaint with the supervisory authority – details of which are given below:

Information Commissioner's Office <https://ico.org.uk/concerns/> Tel: +44 303 123 1113.

Changes to the privacy policy

If we make changes to our Privacy Policy, we will show you what they are here. If these changes are significant, we may also choose to email relevant individuals with new details. If law requires us, we will obtain your consent to make these changes.

Changes to this policy by date: Updated January 2021

Missing Student Policy

My Guardians is committed to safeguarding and promoting the health and welfare of its guardianship students. The missing Student Policy is part of our Safeguarding Policy and guidance for this policy is based on recommendations taken from DfE: Keeping Children Safe in Education 2018, Working together to Safeguard Children 2018 and DfE: Children Missing in Education, September 2016. This Policy is available to all our guardianship students, parents, partner schools and guardianship personnel.

Schools, host families, taxi companies or other members of its personnel could contact my Guardians, if our guardianship student is missing. Immediate actions will be taken when My Guardians is notified that a child is lost or has gone missing.

Missing students are at greater risk of:

- Physical and emotional harm,
- Neglect,
- Sexual exploitation,
- Becoming involved in crime,
- Demonstrating anti-social behaviour,
- Abusing drugs and alcohol,
- Being illegally employed,
- Forced marriages,
- Honour based violence,
- Radicalisation,
- Modern day slavery/ child trafficking,
- Female genital mutilation.

Taking all above into consideration, My Guardians will take immediate actions to ensure the student is found.

Guardianship students could go missing during the following situations:

Airport:

- On the way to and from the airport,
- After not finding their driver at the airport,
- Deliberately absconding from the airport or being abducted.

Homestay:

- Not arriving to the host family for their stay,
- Going missing during their stay with the host family,
- Not returning to the host family at their curfew time,
- Getting lost on purpose on an activity with the host family,
- Deliberately running away or being abducted.

School:

- Not returning to school after an exeat weekend or school holiday,
- Not returning to school at their curfew time,
- Going missing on a school trip, activity or sporting event,
- Deliberately absconding from school,
- Not meeting their transfer to/from school or being abducted.

Missing from School:

If a student is missing from school during term-time then the school will be responsible for taking the lead in investigations and will be responsible for liaising with My Guardians and parents.

Missing at the airport or from the host family:

If a student goes missing at the airport or during any time they are staying with My Guardians host family then My Guardians will be responsible and the following procedures will be followed:

Contact Irina Bowman – Designated Safeguarding Lead on 07919425660. If a student is missing or there is a concern that a student's safety or wellbeing is at risk, it is essential that action be taken immediately. If a student is not home within 30 minutes of their curfew time then please contact DSL Mrs Irina Bowman 07919425660.

My Guardians has an Emergency response policy to deal with Emergency situations. Where there is a concern about a child's immediate welfare and safety then this will be referred to the police and the local authorities.

Following advice from the Designated Safeguarding Lead, host family may be instructed to contact the police and to file a missing child report. It is important that hosts have the following information ready.

- A brief physical description of the child.
- The child's full name and nationality.
- Whether the child currently taking any medication.
- Notes about what the child was wearing.
- Details about where the child was last seen and who they were with

It will be useful if you give police any other information related to the incident, for example, if a student was upset, had argument over the phone with friend or parent that morning.

My Guardians will:

- Inform the student parents immediately and ask them to try to make contact with their son or daughter. Host family must not contact the student parents.
- Inform the school and investigate where or who the student may be with.
- Stay in contact with the host family and the student's parents to keep them up-dated.
- Stay in contact with the police and local authority until the student is found.

If the student is found, or the incident is resolved:

- The host family must directly inform the Designated Safeguarding Lead.
- The Police will be informed if they have been involved.
- The DSL will initiate a full inquiry, and provide a written report.
- This report and the incident log will be kept securely in My Guardians Office.

After the incident:

- The host family or guardian will discuss the incident with the student.
- The DSL will discuss the incident with the parents.
- A conclusion is drawn as to how the incident happened and, if appropriate, procedures may be updated.

Bulling including Cyber-bullying & E-Safety Guidelines

About Bullying

Bullying can occur in any group of people whatever its type or size or the age of its members. There are many different forms of bullying from teasing to harassment. Verbal and psychological bullying can be just as harmful and hurtful as physical violence. Sexual and racial harassment are particularly serious forms of bullying. Many children, and adults, are bullied because they are seen to be 'different' – because of their race, religion or culture, because of their sexuality or gender, or because of any special educational needs or disabilities, they may have.

Signs of Bullying

Some of the ways in which children and young people have described bullying include:

- Being called names or being teased
- Being pushed, hit, kicked, poked or physically hurt in some way
- Having money or personal possessions taken or damaged
- Having rumours spread or being ignored or left out
- Being threatened or made to feel frightened or intimidated
- Being stalked

Cyber-bullying

Our definition of Cyber-bullying includes but is not limited to the following behaviours:

- Abusive or threatening emails or messages,
- Posting abusive comments on social media sites,
- Sharing humiliating videos or photos of someone else,
- Stealing someone's online identity,
- Spreading rumours online,
- Trolling – sending menacing or upsetting messages through social networks, messenger apps, chatrooms or games,
- Developing hate sites about another person,
- Prank calls or messages,
- Group bullying or exclusion online,
- Anonymous messaging,
- Encouraging a young person to self-harm on-line,
- And/or pressuring children into sending inappropriate material.

Bullying online can differ from offline bullying in that it can be inescapable, anonymous, widely shared and can be stored permanently. People may bully online as a form of entertainment, for revenge or to protect a friend. In all cases, this behaviour is unacceptable.

It is important that we educate students about the harm online and offline bullying can do. Any student who experiences bullying should feel supported, believed and that they can share their concerns with My Guardians personnel, teacher or host family. All concerns and disclosures must be passed on to My Guardians Designated Safeguarding Lead for follow up.

Effects of Bullying

The effects of bullying can lead to children and young people to:

- Becoming depressed and suicidal
- Experiencing low self esteem
- Becoming shy and withdrawn
- Self-harm
- Becoming self-conscious
- Experiencing physical complaints, like constant stomach aches and headaches, which are brought on by stress
- Feeling anxious
- Becoming aggressive
- To start to bully other children or adults

My Guardians does not tolerate the bullying of other people in any form whatsoever and all incidents of bullying reported will be fully investigated.

Our students will:

- Respect other people, their space and their belongings
- Be kind to others, even if they are not their friends
- Not walk away if they see someone being bullied
- Try to get help and tell a responsible adult
- Ask for help if they are being bullied

Our guardianship students are given the following advice about bullying:

- Talk to or contact someone you trust, such as your guardian, host family, parent or friend
- Be persistent. If the first person you talk to does not help, do not give up. Speak to someone else
- If you can, write down everything that has been said or done to hurt you. Try to write down how you feel. When you have found someone you can trust, discuss what you have written
- If you find it difficult to talk to an adult ask someone to talk to an adult on your behalf
- Phone My Guardians emergency number: +44 (0) 7919425660
- Phone Childline on free phone 0800 1111. Their helpers provide a confidential helpline for children and students
- Most importantly, do something. Sometimes bullying stops quickly, but doing nothing means it may continue until someone is seriously upset or hurt

E safety Guidelines

These guidelines apply to all My Guardians personnel, including guardianship students, parents, visitors and guests in the host family. E-Safety Guidance should be read in conjunction with our Data Protection and Information Sharing Policy and Safeguarding Policy.

As a host family, you have a responsibility to the students in your care to know what they are doing online during their stay with you.

What is E-Safety?

E-Safety refers to child protection and safeguarding of both children and adults in the digital world. It is about learning to understand and use technologies in a safe, positive way, also about supporting children and adults to develop safe online behaviours.

Risks of using the Internet include:

- Exposure to inappropriate materials, for example, pornographic pictures and videos
- Physical danger and sexual abuse, for example, through 'grooming'
- Cyber-bullying – persistent bullying through the digital medium
- Losing control over pictures and videos

- Obsessive use of the internet and ICT, for example, addiction to video games
- Damage to online reputation
- Inappropriate or illegal behaviour, for example, exposure to hate-mail or offensive images
- Viruses, hacking and security
- Exposure to extremist material and the possibility of radicalisation
- Copyright infringement, for example, the illegal sharing of music, pictures, video or documents

E-Safety is largely concerned with Internet communications. The Internet is accessible from computers, laptops, tablets, mobile phones, games consoles and other devices like the iPod Touch and Internet connected TV. Other communication technologies such as texting and phone calls are also covered by the term 'E-Safety'.

Why provide Internet access?

The Internet is an essential element in 21st century life for education, business and social interaction. My Guardians encourages the provision of Internet access to students to communicate with home and as a necessary tool for schoolwork.

Access to Internet

My Guardians host families are expected to install appropriate parental control software on their routers.

Parental controls however cannot block all inappropriate content on-line. A young person who is actively seeking inappropriate content online might be good at disabling or getting around blocking filters and hiding their search history.

We recommend turning off access to the Internet during the night where student's Internet usage cannot be monitored.

Internet:

- Students aged 10-14 must have adult supervision whilst using the Internet
- Students will be encouraged to tell their host families immediately if they encounter any material that makes them feel uncomfortable
- Internet access will be filtered appropriate to the age of the student

Email:

- All emails sent must be professional in tone and content
- Students must immediately tell an adult if they receive offensive email
- Students must not reveal personal details of themselves or others in email communication (such as address or telephone number). Students must not arrange to meet anyone without specific permission
- Students should be made aware that the writer of an email might not be the person claimed

Social Networking:

- All staff and host family members must not accept friend requests from guardianship students or parents on social media accounts or interact with any guardianship students or parents via any form of social media
- Host families must not post photos of guardianship students under the age of 18 years old on their personal social media accounts

My Guardians host families shall:

- Behave responsibly and professionally at all times in connection with the use of social networking sites and keep up to date with privacy policies of the sites they use
- Use their professional judgment and, where no specific guidance exists, take the most prudent action possible and consult with My Guardians personnel if they are unsure
- Co-operate with My Guardians to ensuring the implementation of this policy Chatrooms and Instant Messaging
- My Guardians students are not permitted to use these facilities on a host family computer

My Guardians Students:

- Must hand mobile phones, tablets, portable electronic games and media players bring to the host family to their host at night-time, if requested by the host
- Are forbidden from sending abusive or inappropriate text messages
- May have their Internet activity checked

My Guardians host families are allowed to take digital photographs and video images of My Guardians students, but must follow guidance in our policy concerning the taking, sharing, distribution and publication of those images.

My Guardians Website:

- The point of contact on the website will be My Guardians address, email and telephone number. Host family or student personal information will not be published
- Website photographs that include My Guardians students will be selected carefully and will only be published with parental permission
- Our students' full names will not be used anywhere on the website, particularly in association with photographs

Cyber bullying

Cyber bullying is the use of the Internet and related technologies to harm other people, in a deliberate, repeated, and hostile manner. When children are the target of bullying via mobile phones, gaming or the Internet, they can often feel very alone and, a once previously safe and enjoyable environment can become threatening, harmful and a source of anxiety. Cyber bullying (along with all forms of bullying) will not be tolerated. All incidents reported will be recorded and investigated.

Host Families Data Security

- In line with the General Data Protection Regulations 2018 (GDPR) My Guardians' host families must ensure that any sensitive data that My Guardians makes available to them on any document is stored securely (e.g. in a folder with a password on an encrypted device) and deleted after the homestay. This data must not be passed on to a third party.

Students' support

- My Guardians students must sign Student Behaviour Policy/Code of Conduct
- E-Safety rules will be given to My Guardians students in their Student Handbook
- Any breaches of the Code of Conduct with reference to ICT will be referred directly to My Guardians and Internet access will be denied
- All students will be informed that network and Internet use on a host family host's computer will be monitored

Parental Support

- Parents' attention will be drawn to My Guardians E-Safety Policy in the parent handbook

- Parents will be asked to read through My Guardians Student Behaviour Policy/Code of Conduct with their son or daughter and student to sign the agreement

Policy Implementation

My Guardians host families receive e-safety advice and guidance as part of their induction programme to ensure they understand their responsibilities, as detailed in this policy.

Further Information

If you would like free independent advice and support about keeping children safe online than you can call the free O2 NSPCC Online Safety Helpline: 0808 800 5002. Please note you do not have to be an O2 customer to access this advice.

Parental Controls

If you are having difficulty setting up parental controls or privacy settings on any portable device then you can make a face-to-face appointment with an O2 guru in any O2 store.

For further details on setting parental controls on your home WI-FI connections then please contact your Internet provider as different providers have different ways to set up parental and privacy controls, for example, you may need to download an App to your phone.

Social Media Sites

Further information on Social Media sites can also be found at <https://www.net-aware.org.uk>. Net aware has up-to-date information on the most popular social networks, apps and games children are currently using.

Anti-Radicalisation - Prevent Duty Policy

Since 1 July 2015, it is the responsibility of all schools and guardianship organisations to be cognisant of the statutory guidance issued under section 29 of the Counter-Terrorism and Security Act 2015. The main aim of the Prevent strategy is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. Protecting Vulnerable People from being drawn into Terrorism is part of the Prevent strategy.

Safeguarding children and providing early intervention to protect and divert people away from being drawn into extremist activity is at the heart of the revised Prevent strategy and My Guardians' personnel must also be aware of how to identify vulnerability and assess risk. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer.

The Internet and the use of social media in particular has become a major factor in the radicalisation of young people. Extremism is 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.

The risk factors set out in the statutory guidance that support an assessment of vulnerability are:

- Spending increasing time in the company of other suspected extremists,
- Changing their style of dress or personal appearance to accord with the group,
- Their day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause,
- Loss of interest in friends & activities not associated with the extremist ideology, group or cause,
- Possession of material or symbols associated with an extremist cause,
- Attempts to recruit others to the group, cause and ideology,
- Communications with others that suggest identification with a group, cause and ideology.

Prevent Lead:

Responsibility for ensuring Prevent Duty is met lies with Irina Bowman, Managing Director, and the Lead Contact for the Prevent Strategy: phone 07919425660, email info@myguardians.co.uk.

Irina Bowman, to comply with her duties as the Prevent Lead, completed three online courses provided by the government: Prevent Awareness, Prevent Referrals, and Channel Awareness.

All our other staff, volunteers and homestays is also encouraged to complete the government basic level Prevent Awareness e-learning.

Any member of staff who identifies concerns about a Student must report the Student immediately to the Designated Safeguarding Lead of My Guardians, who in turn will discuss these concerns with the Local Safeguarding Children Board and police. The Local Safeguarding Children Board's document entitled, 'Making a Referral to Children's Social Care' should be followed. A multi-agency assessment meeting, otherwise known as MASH or the Local Safeguarding Children Board will determine the appropriate response and level of support.

