

## Child Protection Policy and Procedures

UKG is committed to the protection of all children in its care. UKG's mission is to keep our students safe while they are here and to improve the quality of our service and standards as we grow.

We are committed to safeguarding, student welfare and undertaking rigorous checks on all who work with us and we expect all staff and volunteers to share this commitment. We have a clear Child Protection strategy. We operate in line with UNCRC Global Code of Ethics for Tourism. The safety and welfare of children, or Child Protection, means protecting children from physical, emotional or sexual abuse or neglect. We aim to ensure that the students in our care experience at all times a caring and secure environment in which they feel safe, respected and valued. In pursuit of this aim, UKG undertakes the following:

1. To have at least two designated Child Protection Coordinators (CPC), who have received Child Protection (CP) Training and have responsibility for responding to CP concerns raised by other guardianship personnel/students. The UKG's CPC will record any allegations/concerns and refer them where appropriate, to the relevant Children's Services Duty team in their area or to the Out of Hours/Emergency Duty Team (after 5.00pm and before 9.00am week-days and during weekends). Our Chief Child Protection Officer is Susan Fang, Director of Guardianships. The Deputy Child Protection Officer (CPO) is Wendy Hou.
2. To ensure that all guardianship personnel receive CP Awareness Training and to make them and the students in our care aware of the need to report allegations and suspicions of child abuse to the CPC. If the CPC/Deputy are unavailable, local Duty Team must be contacted directly where appropriate as delay could put a child/young person at further risk of harm.
3. To promote an environment of trust, openness and clear communication between students, school and UKG staff and our Host Families, so that student welfare, safety and pastoral care is recognised as the top priority.
4. To respond to any reported allegation or suspicion of child abuse in accordance with the UKG Procedures and those set out in the Child Protection Procedures of the Association for the Education and Guardianship of International Students (AEGIS).
5. To ensure that all guardianship personnel and personnel offering outsourced services who come into direct contact with students in our care are recruited using safe recruitment practices and are formally screened through the completion of an Enhanced DBS check.
6. To maintain links with the appropriate agencies who have a statutory responsibility to deal with child welfare and child protection concerns.

### **Hertfordshire Child Protection Concerns (24 hours)**

**Tel: 020 8901 2690**

#### **Student's local Children & Family Services:**

**Tel:**

**Out of hours number:**

**Always call 999 in an emergency**

## **Definition of terms**

For the purposes of this Child Protection Policy (CPP), all references to 'child' or 'children' - whether singular or plural – are used and are taken to refer to students enrolled at a school or other educational institution in the United Kingdom who are in the care of an accredited Guardianship Organisation.

'Guardianship Organisation' or name of the Guardianship Organisation (name: UKGuardianship, UKG) are used and are taken to refer to the company or organisation or individual employed by parents to be the Educational Guardians of a child in the UK.

'Guardianship personnel' means an educational guardian having any responsibility for a child as defined in the contract during that contractual period. This may also refer to any personnel at UKG, whether paid or unpaid, whether under a contract of service or apprenticeship, under a contract for services, or otherwise than under a contract, who has similar responsibility for a child and may be interacting with children for or on behalf of UKG. 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.

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- preventing impairment of children's health or development;
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best life chances.

Child protection is part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

## **Need for and scope of policy**

A child protection policy helps to create a safe and positive environment for children. Although no standards or processes can offer complete protection for children, the risk of abuse against children can be minimised by implementing such a policy and following the standards enshrined in it.

This child protection policy clarifies what UKG requires in relation to the protection of children. It sets out standards of behaviour for guardianship personnel when they are around children and what to do if they notice, or are told about, inappropriate behaviour in others.

This child protection policy is a statement of intent that demonstrates UKG's commitment to safeguard children from harm. It will help UKG and its guardianship personnel to undertake best practice in this area and deter those who would wish to abuse children from joining UKG as guardianship personnel.

This policy also provides a basis of protection for its guardianship personnel and persons acting on behalf of UKG.

## **Aims of the policy**

The welfare of children in guardianship is a paramount concern for UKG. It is incumbent upon UKG to do everything possible to ensure that children are protected from harm at all times.

## **This Child Protection Policy sets out:**

### **1. UKG's principles for the protection of children.**

UKG recognises that child protection is not only a legal obligation but also a corporate and individual responsibility.

### **2. UKG's expectations in terms of behaviour and good practice for working with children.**

UKG believes that everyone involved must accept responsibility and take precautions to help create a safe place for children and their protection. This, in turn, requires that everyone be well informed and aware of child protection issues. Likewise, children, their parents and house staff should know that there is always a responsible adult within UKG whom they can approach if they are worried or in difficulty. UKG should maintain an ethos where children feel secure and are encouraged to talk and are always listened to.

### **3. UKG's guidelines for responding appropriately if abuse of a child is alleged, disclosed, discovered or suspected.**

UKG encourages openness about concerns relating to child protection matters because child abuse thrives on secrecy. The guidelines in this policy explain what should be done about those concerns.

## **The role of the Child Protection Coordinator (CPC)**

UKG's Child Protection Coordinators are Wendy Hou and Susan Fang.

The Child Protection Coordinator takes specific responsibility for Child Protection matters within UKG. This person is responsible for:

- 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 1989, 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 UKG.
- ensuring the procedures below are followed within UKG.
- liaison over child protection procedures with the Social Services Department.
- receiving reports of alleged or suspected child abuse within UKG or reported by a child relating to incidents at home or outside UKG, 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. All UKG safeguarding records will be stored on a password protected document which can only be accessed by the Child Protection Coordinators.

UKG's Child Protection Coordinators can be contacted on 020 8387 4095 or [service@ukguardianship.com](mailto:service@ukguardianship.com).

## The role of UKG and its guardianship personnel

UKG and guardianship personnel should be aware of the need to report allegations or suspicions of child abuse to the relevant person at UKG. Children often tell other children, rather than guardianship personnel or other adults, about abuse.

UKG should keep accurate and unchanged/unchangeable records of alleged or suspected abuse, even if such abuse is only a minor incident.

A Child Protection Coordinator should be appointed in each AEGIS member organisation. The CPC has responsibility for receiving complaints of abuse, investigating those complaints and reporting any complaints to the appropriate authority, including the management of the AEGIS member organisation.

## Lines of communication within UKG

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

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

- A child should speak to a member of the guardianship personnel or the housestaff at school about any abuse that is taking place.
- If the alleged abuser is one of the guardianship personnel, the child should know that the first port of call is the Director, (or Child Protection Coordinator) at UKG.
- If the alleged abuser is the Director of UKG the child should initially report it to another member of the guardianship personnel. The guardianship personnel should then report the matter to a deputy within UKG or to the Social Services Department, whichever is appropriate.

Parents, in a similar way, should report alleged abuse to one of the guardianship personnel or the Child Protection Coordinator at UKG or one of the house staff at school, depending on whom the alleged abuser is.

Any person responsible for the welfare of a child has a duty under English law to report any suspicions of abuse to the relevant authority.

## How guardianship personnel should respond to any suspicion of abuse

Any member of the guardianship personnel who is told of any incident or has strong suspicion of physical or sexual child abuse must report the information to the CPC. (In the absence of the CPC, an immediate report should be made to his/her deputy or Director).

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 not distressed. 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 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. Guardianship personnel should guarantee that they will only pass on information to the minimum number of people who must be told to ensure that the proper action is taken to sort out the problem, that they will never tell anyone who does not have a clear 'need to know' and that they will personally take whatever steps they can to protect the informing child/children or guardianship personnel from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.
- Any questioning should be limited to the minimum necessary to seek clarification only, strictly avoiding 'leading' the child or adult who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened. (Questions such as, 'Did he do X to you?' should not be used; instead a minimum number of questions of the 'Tell me what happened?' type may be asked).
- The alleged perpetrator should not be criticised because the child's emotions may already be horribly mixed. The child should not be asked to repeat everything that s/he has already disclosed to another member of the guardianship personnel.
- As soon as the child or adult has disclosed that he or she believes that something abusive has happened to him or her, or to someone else, no further questions should be asked of him or her. Further questioning could cause more damage and prejudice possible criminal proceedings.
- The informing child or adult should be asked what steps s/he would like taken to protect him/her now that the allegations have been made and should be given an assurance that UKG will try to follow these wishes.
- The matter should be referred immediately, with all relevant details, to the CPC at UKG.
- The adult to whom the disclosure has been made should make a written record as soon as possible of what s/he has been told. The record should not include the writer's own assumptions and interpretations but solely what s/he has heard and seen. Original notes should not be destroyed, even if the record may be written up more neatly and fully at a later stage. The record should comprise dates, times, places, plus any non-verbal behaviour as well as words used, including sexual words (if any used). If injury is apparent, a diagram should be appended in order to give exact location.
- An allegation of abuse should never be discounted simply on the grounds of the child's location or because the alleged abuser is someone well known to and trusted by the individual to whom the disclosure has been made.

## **Action by UKG**

When the CPC at UKG receives an allegation of physical or sexual abuse s/he should:

- a) Take any steps needed to protect any child involved from risk of immediate harm. Furthermore, UKG should take any necessary steps for the longer-term protection and support of each child who has made allegations of abuse, or who is alleged to have suffered from abuse, taking his or her wishes fully into account. This may involve the child receiving continuing support and protection from the guardianship personnel chosen by him or her, or changing accommodation, or returning to his or her parents temporarily.
- b) Not interview or investigate the allegation further but refer the matter immediately to the Duty Team Leader at the local Social Services office. UKG should speak personally to the Team Leader and not rely on leaving a message.
- c) Consult with the Duty Team Leader regarding contacting parents, other guardianship personnel, police, doctor or the alleged perpetrator or witnesses directly. Whilst UKG has a duty first and foremost to the child, it must at all times respect the rights of parents and keep them informed of all matters relating to the child.
- d) Contact the Team Manager in the Social Services Department (SSD) who will initiate an independent investigation if this proves to be necessary. The Team Manager will arrange, within pre-set limits, the involvement of the relevant specialist police personnel and, if necessary, a meeting of the agencies who may need to be involved, together with UKG.
- e) Inform the child or guardianship personnel who made the initial allegation of what the next steps are to be, having agreed these with the Team Manager. It is helpful for the call to the Team Manager to be made while the child or adult is in attendance, so that he or she can be told the likely next steps immediately after the call.
- f) Inform the Head teacher of the school the child is attending (unless s/he is the subject of any of the allegations or suspicions) of the allegation and the action as taken above and, if the allegation is concerning an incident within the School context, agree necessary further action in line with these standards.
- g) If necessary, cease to use, pending investigation, any member of its guardianship personnel who is alleged to have abused a child or children. UKG should not hesitate to cease to use any member of the guardianship personnel, without prejudgement of guilt and as a precautionary measure, where there is a concern about possible abuse.
- h) Take any necessary steps to protect and support a child who is alleged to have abused another and inform his/her parents immediately.
- i) Ensure that any child being interviewed by the police has available supportive guardianship personnel of his or her own choice to accompany him or her if this becomes necessary.
- j) Make arrangements, where feasible, for any child who has been the subject of abuse to receive any necessary continuing counselling and support, by agreement with his or her parents where appropriate.



## **Allegations of abuse against a member of the guardianship personnel or anyone in their household**

Following investigation, UKG should consider taking, and if necessary and appropriate, should take the necessary measures to safeguard the child against any member of the guardianship personnel or of his/her household, where it believes children are at risk of abuse from that member of the guardianship personnel or of their household, even in cases where there may be no criminal prosecution. Cessation from a role within the guardianship personnel (without prejudice) may be necessary to protect all concerned, including the guardianship personnel or his/her household member.

UKG must make its own decision on whether a child's welfare is at risk, whatever the outcome of a police or SSD investigation may be. The level of evidence needed for criminal prosecution is likely to be higher than that which may trigger valid and appropriate precautionary proceedings taken by UKG.

Appropriate precautionary proceedings and grounds for concern over its children's welfare may therefore be based on 'balance of probability', rather than on evidence 'beyond reasonable doubt'.

In any instance of an allegation of child abuse UKG will, after reasonable investigation and if satisfied on a balance of probabilities that there is substance to the allegation, immediately terminate any contract or other arrangement with that member of the guardianship personnel or other person. UKG has a duty to terminate any possible contact between the child and that person.

Where UKG has 'low level' concerns that do not amount to allegations or suspicions of specific abuse, but which may indicate the possibility of abuse occurring, the Director of UKG or designated member of staff should discuss these with the Social Services Department.

## **Recruitment and screening**

All AEGIS member GOs, when using outsourced services (e.g. taxi firms) whose personnel may have contact with a child, must obtain a written assurance from the service provider that all such personnel have been subjected to enhanced Disclosure and Barring Service checks (DBS checks) and other relevant checks done according to the principles and guidelines of the AEGIS Code of Practice.

UKG, in line with the AEGIS Code of Practice, should make all guardianship personnel aware of the child protection policy of UKG. Guardianship personnel should be asked to sign a Child Protection declaration. UKG will take up not fewer than 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 judgement of these declarations and the results of an enhanced DBS check.

If any member of the guardianship personnel is a risk to children, s/he needs to understand that s/he will not be allowed to work with children again in UKG or any allied organisation/agency.

## Complaints and abuse

The CPC 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.

## False alarms

It is important to realise that the Children Act will inevitably lead to some investigations being triggered which 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 Director of UKG, guardianship personnel, parents and children involved in any false alarm investigation to assist in recovery from the incident, as well as working with UKG to assist in 'living through' and recovering from a substantial investigation.

## Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where adults fail to do so. All adults involved in UKG's 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.

NSPCC Whistleblowing Advice Line: **0800 028 0285** or **[help@nspcc.org.uk](mailto:help@nspcc.org.uk)**



## APPENDIX 1

*GUIDANCE NOTES REQUIRED AS A MINIMUM STANDARD for those in contact with children under the control of the AEGIS member*

### Definition of child 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 UKG and abuse of one child by another child. In the case of abuse by a child or group of children, the key issues which identify the problem as abuse (rather than an isolated instance of bullying or 'adolescent experimentation', which might be considered within normal bounds of a child community) are:

- the frequency, nature or severity of the incidents;
- whether the victim was coerced by physical force, fear, or by a child or group of children having power or authority over him or her;
- whether the incident involved a potentially criminal act and whether if the same incident (or injury) had occurred to a member of the guardianship personnel or another adult, it would have been regarded as assault or otherwise actionable.

The definitions below were 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 (2015)*:

- **Abuse** – A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.
- **Physical Abuse** – A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
- **Emotional abuse** – The persistent emotional maltreatment of a child such as to cause severe and persistent 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 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, though it may occur alone.

- **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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
- **Neglect** – The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
  - provide adequate food, clothing and shelter (including exclusion from home or abandonment);
  - protect a child from physical and emotional harm or danger;
  - ensure adequate supervision (including the use of inadequate 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.

A child may suffer more than one category of abuse.

## Signs of Child Abuse

### THE CHILD WITH AN INJURY

- a) **BRUISES** – on any part of the body, but especially on the head or face and trunk. Sometimes a finger pattern is visible, which could indicate that the child has been gripped tightly and possibly violently shaken.
- b) **WEALS** – on any part of the body, often linear indicating abuse with a whip, belt or other edged implement; when raised and white, are relatively easy to identify, but when older may be seen as faint linear bruises.
- c) **BITE MARKS** – human bite marks can be differentiated from animal bites. Typically, human bites form two hemispherical lines on the skin.
- d) **BLACK EYE** – often without gross bruising of the forehead.
- e) **BURNS AND SCALDS** – these may be severe and tend to occur in older children.
- f) **INJURIES ABOUT OR INSIDE THE MOUTH** – especially to gum margin, or to the frenulum inside the upper lip, or under the tongue.
- g) **INJURIES TO EARS** - especially when there is bleeding from the entrance to the ear or bruising around or behind the ear lobe(s) indicating injury by pulling.

- h) INJURIES TO LIMBS – tender swollen joints or suspected fractures in any part of the body.
- i) INJURIES TO GENITAL AREA – especially where bleeding is reported, or a child is walking awkwardly or bruising of any kind is noted.

## THE SICK CHILD

There is no injury but the child is definitely ill with no obvious diagnosis.

- a) A listless, apathetic or restless child who is difficult to rouse.
- b) Pallor, failure to thrive, loss of weight and signs of poor nutrition – perhaps with sores about the mouth and on the skin leading to a poor growth rate.

## THE EMOTIONALLY DEPRIVED CHILD

A variety of behavioural patterns may be seen in the emotionally abused child. Some present as naughty, overactive, demanding, restless, disobedient and unduly aggressive. Others may be withdrawn and apathetic, unable to participate in play and with an impaired capacity to enjoy life. “Frozen watchfulness” sometimes describes the appearance of other unhappy frightened children.

- a) Young children may show clinging and demanding behaviour as an instinctive response to fear of inadequate parenting.
- b) Some children may modify their behaviour in response to parental demands and show intense sensitivity to parental moods, reacting with precocious behaviour and high frustration tolerance to the high expectations of their parents. Physical punishment tends to cause an increase in aggressive behaviour in such children.
- c) The environment of the abused child critically influences development (failure of intellectual development, failure to grow or put on weight, incontinence, enuresis, language delay, poor motor/tactile skills)

## 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: e.g., 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.

### Additional documentation

UKG's Safeguarding Policy can be found in the Student and Parent Handbooks:  
[ukguardianship.com/uk-guardianship/handbook-and-policies/](http://ukguardianship.com/uk-guardianship/handbook-and-policies/)

### Useful phone numbers

UKG's Child Protection Coordinators, Wendy Hou and Susan Fang: **020 8387 4095**

UKG's Child Protection Coordinators, out of hours: **07834 465 463**

Hertfordshire Child Protection Concerns (24 hours): **0300 123 4043**

Local Authority Designated Officer (LADO): **01992 555420**

NSPCC Whistleblowing Advice Line: **0800 028 0285**