

Aspire Guardian's Host Family Contract 2024/25

In order to qualify as a host family for Aspire Guardians UK LTD (Aspire), the following terms and conditions must be met and agreed to by a prospective family. Please note that meeting the conditions below does not guarantee the placement of an international student.

Aspire is committed to safeguarding (see [appendix 2](#) for Safeguarding and Child Protection Policy) and promoting the welfare of children, young people and vulnerable adults and expects all host families to share this commitment. Host families should share the vision of Aspire that by living and learning together, we can work towards a more tolerant and understanding world.

Host families need to complete a comprehensive application form and if successful, their home is subject to an inspection. Before acceptance as a host family, everyone over 16 residing at the address will be expected to have a satisfactory Enhanced Disclosure and Barring Service certificate (police check).

The Association for the Education and Guardianship of International Students (AEGIS) purpose is to safeguard the welfare of international students studying at schools, colleges and universities in the UK, making them feel safe, welcome and cared for. AEGIS may request from Aspire, contact details (telephone and email address) of host families for AEGIS to send through any communication or questionnaires. Aspire requests that you adhere by completing and returning the questionnaires when they are sent for our accreditation inspection in a timely manner.

Recruitment and Home Visit

Once you have been selected as a host family for Aspire, we will need to complete some checks before we can start placing students with you. We will visit you in your home and conduct an inspection on your home to make sure it is suitable to accommodate our students as well as go through some safeguarding training with you. We will require a number of personal documents before we can start placing students which are detailed below. Once your application is successful and you have been recruited, a Aspire representative will visit you to monitor the status of the house and also provide a refresher on safeguarding.

DBS Check

Aspire will be responsible for paying the enhanced DBS fee of all individuals 16 years and residing permanently at the family address which is valid for a maximum of three years. It is a requirement that families disclose to us any possible convictions which may post-date the completion of any DBS check related to the application to provide homestay accommodation. Failure to do so may jeopardise an arrangement to host our students. Aspire will need to run a new DBS check every three years going forward.

Aspire will make every effort to match a student to the needs and interests of the host family, but cannot make decisions based on race, cultural identity, religious background or sexual orientation.

Gas Safety Regulations 1998¹

Host families providing accommodation for our students are classified as landlords under the above regulations. This means all boilers, fires and central heating systems (gas) need to be installed and serviced by a 'competent persons' i.e. Gas Safe registered engineers. You can learn more about the gas safety checks at www.GasSafeRegister.co.uk or call 0800 408 5500. Aspire requires a copy of certification to prove that your gas appliances are safe.

All hosts require gas certificates annually which will need to be shared with Aspire. This is to ensure that you and our students are kept safe throughout their stay.

Expectations of a Host Family

Host families shall:

1. Exercise the same levels of care as a responsible parent²
2. Host families accept day to day responsibility for the care of the student for the duration of their stay or whilst they are under your care and are expected to show due concern for the welfare, safety and security of the student during their stay and report any concerns to your Aspire representative promptly
3. Acknowledge that the primary consideration in hosting a student is for a cross-cultural experience and therefore agree to respect the culture, values and religion of the student
4. Host families must provide the student with a key or someone must be at home to provide access as well as the code for a residential alarm if one is used
5. Provide each student with a private bedroom, which no other family member will use for the duration of their stay
6. The host family must provide clean and comfortable accommodation for the student. Their privacy should be respected
7. Students should have easy access to bathroom facilities and regular access to laundry facilities
8. There should be morning and evening access to the bathroom and a shower or bath every day. If you don't want students to use the bath or shower after a certain time, please explain this clearly to them at the start of hosting
9. On a weekly basis, the host family should provide clean towels, bed linen and one load of laundry
10. Upon arrival, the host family will take the time to explain their house guidelines to the student and agree together on any basic rules which will help the placement run smoothly
11. Ensure that the student is provided three nutritious meals per day, throughout the period of their stay. An evening meal shall be prepared and left if the family is not home for dinner or if the student comes home late from school unless otherwise agreed to by the parties concerned. Care should be taken to provide the student with a balanced and appropriate diet taking into consideration any agreed dietary requirements.
12. Ensure that the student does not have to prepare meals for him/herself on a regular basis unless otherwise agreed to by the parties concerned; however, students may be expected to make their own packed lunch or breakfast if that is the usual practice in the family. There should be a starter or dessert and bread available.

¹ <http://www.legislation.gov.uk/ukxi/1998/2451/contents/made>

² <http://www.lawandparents.co.uk/what-in-loco-parentis-means-you.html>

13. Snacks: At other times, students should be allowed to help themselves to a soft drink, hot drink, biscuits and fresh fruit if they require sustenance outside of meal times. These items can be pointed out specifically to the students as 'snack' food
14. Interact with the student on a daily basis and include the student in appropriate family activities. Host families will help students feel at home and treat them as a member of the family rather than a lodger or paying guest
15. Advise the student that they are not to visit any private area of the house, including any private bedrooms and bathrooms of other family members
16. Host families must speak English to the student at all times, unless the student is in distress and requires to explain something in their native language and the host family is able to do so. There may be times when the student needs to speak in his/her native language or in privacy to a Aspire representative
17. Maintain the fee at the rate determined by Aspire with no additional charges to the student unless mutually agreed upon
18. Host families receive an expenses payment for providing a home and hospitality to international students. It is the hosts' responsibility to declare this income to HM Revenue and Customs.
19. Ensure that family members do not borrow money from the student and that the student does not borrow money from family members
20. Agree that you own your own home or have advised your landlord of your plan to host an international student
21. Contact your Aspire representative if problems arise between student and family members; cooperate with Aspire in trying to reach a reasonable, equitable solution for all concerned
22. Inform Aspire of all other students or house guests living in the house, including those who take up residence after the student arrives
23. Inform Aspire of plans to be away from the home for any period of time during the placement
24. Ensure that students are not required to baby-sit unless they agree to
25. Treat the students with respect and kindness and expect the same in return
26. Never resort to abusive, aggressive or otherwise inappropriate behaviour
27. Never initiate or participate in a sexually-oriented discussion, the viewing of sexually explicit photographs, written materials or films with the student
28. Be suitably clothed and covered at all times
29. Never touch the student inappropriately
30. Host families are under no obligation to provide accommodation for students' families. We recommend that visiting parents arrange hotel accommodation during their visits
31. Host families must be prepared to make a commitment for the full academic year but Aspire can assist with short stay substitute families should a family emergency arise
32. Host families may host more than one student and no more than two per bedroom. Aspire will always offer students their own room, unless it is considered 'emergency hosting' which is less than 14 days' notice, in which case they are informed that they might have to share. If students share, they are of the same gender, with a maximum of two per bedroom. Ideally the students will be a year group either side of each other.
33. The student should occasionally be allowed to accept incoming calls on your landline. However, most have their own smartphone and should not ask to use your line at all. Aspire are always available to offer advice and guidelines on the appropriate use of electronic devices

34. In exceptional circumstances, host families wishing to end a placement before it has finished must contact Aspire head office directly
35. Host families should ensure that they have adequate insurance to cover against fire and other damages and should inform their insurer that they have paying guests in their home. They should inform the student of the family's fire escape plan
36. Host families are expected to keep Aspire informed in writing of any changes in the home or family which may affect this agreement
37. Host families must not have any other paying guests or run a bed and breakfast arrangement throughout the duration they are looking after a student on behalf of Aspire.

All families are expected to provide a warm, secure, healthy environment for international students. They are expected to always respect the student's privacy and expect the student to respect theirs. Students are provided with a handbook that sets out these expectations whilst at host families.

International students are particularly vulnerable because they are in a country where they are largely unfamiliar with customs and language and, generally speaking, may not know whom to turn to for help. If a student reports that there are problems in the home such as alcohol or drug abuse, sexual impropriety, inappropriate conduct, or abusive language or behaviour, the student will be removed from the home without notice and legal or other action will be taken if warranted.

Moreover, Aspire Guardians reserves the right to move a student without the usual advance notice if a situation is unsatisfactory or if problems cannot be resolved between family members and the student. When a student is moved, the family may be required to return a portion of their fee.

The family hereby agrees to release Aspire Guardians from all liability for loss or damage to their home caused by the student(s) and hereby releases Aspire Guardians and its agents and employees from all liability arising out of the participation in the host period including, without limitation for property damage or loss, or the debts, conducts or actions of the students assigned to the home. Students are responsible for their own debts, conduct and actions while in the Program.

Complaints by Host Families

If the host family has any concerns about the student staying with them, or concerns about their well being, mental state or behaviour in general, they are to contact Aspire immediately. Please refer to [appendix 6](#) for full Complaints Policy.

Emergencies

Should an emergency arise such as a student having to attend hospital, not returning to the host family home and would appear missing ([appendix 5](#) for Absent and Missing Child Policy), or if the student presents violent or unnerving behaviour, which results in the host family no longer feeling comfortable, the host family must contact Aspire immediately.

If a student is suspended from school then the host family will be called upon to host the student for the additional days. If the host family is unavailable then the student will be placed into an emergency host family until s/he is permitted to return to school.

If a student is excluded from school then the host family will be called upon to host the student for the additional days. If the host family is unavailable then the student will be placed into an emergency host family until s/he is able to travel to their home country.

Emergency contact details

Address: 5 Colliers Rise, Radstock, BA3 3AU

Emergency Phone: +44 7754 181 244

Finance

Please refer to [appendix 1](#) for full fee and expense rates.

Aspire makes expenses payments to the host families.

All payments to host families will be made by BACS transfer within 10 working days.

Payments to host families may be subject to taxation. Aspire can offer guidance on where to find further information on the 'Rent a Room' scheme or host families can refer to the HMRC website: <https://www.gov.uk/rent-room-in-your-home/the-rent-a-roomscheme>.

Host families should not lend money to students. If there is a cash flow issue (lost bank card, etc.), Aspire should be informed immediately so that this can be resolved with the support of the student's parents. All financial transactions in such a case should be via Aspire as this protects both the host family and the student. If a host family acts outside of this instruction, there can be no guarantee that Aspire will refund the family for any loans made.

Cancellation of Hosting

Although we ask host families to commit to specific dates, hosting students can lead to last-minute changes. Aspire is dedicated to planning in advance and ensuring host family availability. We gather students' requirements well ahead of time and regularly update our records to minimise disruptions for both host families and students. However, students may change or cancel their plans, directly affecting host families.

If a student cancels within seven days of the start date and you have received the Confirmation Email you will receive 50% of the fees for up to the first 7 days. (We are not obligated to pay a cancellation of more than 7 days).

If a student cancels prior to seven days of the start date no cancellation fees are payable even if you have received the Confirmation Email.

If a cancellation occurs less than 48 hours after we have asked you to host, no cancellation fees are payable.

If a student cancels after arrival you will receive 50% of the fees for up to the first seven days. (We are not obligated to pay a cancellation of more than 7 days).

Termination of Contract

Host families are able to terminate their contract with Aspire with a notice period of one school term.

Students are able to terminate their contract with Aspire with a notice period of one school term.

Aspire reserves the right to terminate the contract with a host family or student with a notice of one school term or sooner should there be breach of contract or policy. This includes a student being expelled.

If a student wishes to withdraw for any other reason, the host family will be informed of the circumstances. Aspire may offer compensation to the host family for the price of any food which may have been purchased in advance.

Aspire Representative

Aspire will have a representative for each school where students have been placed.

The area rep will assist with host family placements and act as the first point of contact with the student, host family and school (if relevant). They will feed back to the Aspire main office with written contact reports. Host families maintain a close liaison with the area rep and they are in a position to help resolve any problems that may arise during the year.

Aspire Management will intervene in disputes which arise due to misconduct either by the host family or by the student. Support will be provided to resolve disputes if needed.

Aspire may remove a student from a placement, without prior discussion, if safeguarding the welfare of the student demands such an approach. At the discretion of Aspire, host families may be compensated for food purchased in advance, depending on the circumstances.

Summary

All families are expected to provide a warm, secure, healthy environment for international students. They are expected to always respect the student's privacy and to expect the student to respect theirs. International students are particularly vulnerable because they are in a country where they are largely unfamiliar with customs and language and, generally speaking, may not know whom to turn to for help. If a student reports that there are problems in the home such as alcohol or drug abuse, sexual impropriety, inappropriate conduct, or abusive language or behaviour, the student will be removed from the home without notice, and legal or other action will be taken if warranted.

Moreover, Aspire reserves the right to move a student without the usual advance notice if a situation is unsatisfactory or if problems cannot be resolved between family members and students. When a student is moved, the family may be required to return a portion of their fee.

Included in this handbook are the following policies which we ask the host family to familiarise themselves and adhere to whilst hosting a student:

- a. Safeguarding and Child Protection Policy - [Appendix 2](#);
- b. Whistleblowing Policy - [Appendix 3](#);
- c. Data Protection Policy - [Appendix 4](#);
- d. Absent and Missing Child Policy - [Appendix 5](#);
- e. Complaints Policy - [Appendix 6](#); and
- f. Anti-radicalisation and Prevent Policy - [Appendix 7](#)

The host family hereby agrees to release Aspire from all liability for loss or damage to their home caused by the student(s) and hereby releases Aspire and its agents and employees from

all liability arising out of the participation in the host period including, without limitation for property damage or loss, or the debts, conducts or actions of the students assigned to the home. Students are responsible for their own debts, conduct and actions while in the UK.

Contract start date: _____

Contract Termination date: _____

Host Parent One
Name:

Host Family Member
Name:

(Print in block capitals)

(Print in block capitals)

Signed

Signed

Date:

Date:

List of other people permanently residing at home address:

Name: _____ D.O.B: _____ Male () Female ()

Name: _____ D.O.B: _____ Male () Female ()

Name: _____ D.O.B: _____ Male () Female ()

Appendix 1

Full Fees & Expense Rates

Hosting

£60 per night

Includes three meals, all linens and blankets towels, wifi, bedroom, shared bathroom, kitchen, living area and a desk or area for quiet study.

Transport

Personal vehicle - £0.50 per mile

Public transport - buses, trains, trams, tube - at cost

£15 per hour - pick up/drop off time (school or airport)

Meals

Takeaway* - up to £30

Restaurant* - up to £50

**At the students' request*

Celebrations**

Birthday Cake - up to £10

Celebratory Dinner - up to £50

***to be confirmed with Aspire or parents first*

Tickets***

At cost

****please check with Aspire of parents first for any activities over £25.*

Please keep all receipts for reimbursements of travel, entry fees and meal receipts.

Personal car transfers will be based on Google Maps point to point and Aspire need to be notified of a change in journey or lots of traffic at the earliest, safest and convenient time.

What you can not claim

- Extra bedding or blankets - Included in hosting fees
- Snacks, tea, coffee within the home - Included in hosting fees
- Personal meals out, without the student present
- Travel to and from family excursions

If you are not sure, please check with an Aspire member of staff

Appendix 2

Safeguarding and Child Protection Policy

Policy Statement

Aspire Guardians recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We acknowledge that “it could happen here”. We make every effort to ensure that students and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

The purpose of this policy is to provide staff, volunteers and homestays with the framework they need in order to keep children safe and secure whilst they are in our care. The policy also informs parents, agents and partner schools how we will safeguard their children whilst they are in our care.

This policy is based on guidance from the most recent versions of KCSIE and Working Together to Safeguard Children. It also makes use of guidance from the NSPCC website.

Table of Contents

<i>Policy Statement</i>	0
Key Safeguarding Contact Details	4
<i>Child Protection Principles</i>	4
<i>Supporting procedures and documents</i>	6
Government Guidance	6
<i>Definitions</i>	6
<i>What is Abuse and Neglect?</i>	7
Types of Abuse and Neglect	7
Signs of Abuse and Neglect	8
Common Signs	9
Indicators of Physical Abuse	9
Indicators of Emotional Abuse	10
Indicators of Sexual Abuse	10
Emotional and Behavioural signs	10
Physical Signs	10
Indicators of Neglect	11
Health and Development Problems	11
Housing and Family Issues	11
Change in Behaviour	11
<i>Procedures</i>	12
Actions to be followed if there are concerns about a child or young person	12
How Aspire Guardians will respond to child on child Abuse	12
How Students can Raise a Concern	14
How Allegations will be Recorded, Investigated and Dealt With	14
Risk Assessment	14
How Victims, Perpetrators and any Other Children Affected by Child on Child Abuse will be Supported	14
Management of the Report	15
Allegations of Abuse Against a Member of Staff or Homestay	15
Allegations That Meet the Threshold	15
Allegations That do not Meet the Threshold	16
Learning Lessons	17
How to Receive a Disclosure From a Child or Young Person	17
Sharing Safeguarding Information	17
<i>Role of DSL (and DDSL)</i>	18
Expectations of the Designated Safeguarding Lead	18
Contact Details for the DSL (and DDSL)	19
<i>Prevent</i>	19
Prevent Lead Contact Details	19
<i>Record Keeping</i>	19
<i>Training and updates</i>	20

DSL	20
Other Staff and Homestays	20
<i>Whistleblowing</i>	20
<i>Local Safeguarding Partnerships (LSPs)</i>	21
Contact Details for LSP and LADO where Aspire Guardians is located	21
Contact Details for LSPs and LADOs across the areas that Aspire Guardians operates (Currently N/A)	22
<i>Liaison with Parents / Agents and Partner Schools</i>	22
<i>Further Detail on Specific Types of Abuse</i>	22
<i>Safeguarding Issues</i>	22
Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	22
Child Criminal Exploitation (CCE)	24
Child Sexual Exploitation (CSE)	24
<i>Mental Health</i>	24
<i>Sexual Violence and Sexual Harassment Between Children in Schools and Colleges</i>	25
Context	25
What is Sexual Violence and Sexual Harassment?	26
Sexual Violence	26
What is Consent?	27
Sexual Harassment	27
Upskirting	27
The Response to a Report of Sexual Violence or Sexual Harassment	28
Serious Violence	28
Children Who are Absent from Education	28
County Lines	29
Modern Slavery and the National Referral Mechanism	29
Cybercrime	29
So-Called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)	30
Actions	30
FGM	31
Forced Marriage	31
Domestic Abuse	31
Online Safety	32
<i>Review</i>	32
<i>Appendix 1: Incident Form</i>	34
<i>Appendix 2: Student Removal Form</i>	36

Key Safeguarding Contact Details

Role	Name	Telephone Number	Email
Designated Safeguarding Lead (DSL)	Suki Thomas	+44 7542 181 244	sthomas@aspireguardians.com
Aspire Guardians 24-Hour emergency contact	Aspire Guardians	UK +44 7542 181 244 HK +852 5978 6168	n/a
LSP (Local Safeguarding Partnerships)	Bath & North East Somerset Community Safety and Safeguarding Partnership	01225 396312 or 01225 396313	n/a
LADO (Local Authority Designated Officer)	BCSSP	999 Emergency Duty Team on 01454 615165	LADO@bathnes.gov.uk

Child Protection Principles

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

- Aspire Guardians will provide a safe and secure environment for all students;
- Homestays and transfer companies provide a safe and secure environment for all students;
- All students feel safe, secure and protected from harm;
- All students know who to turn to for help, advice or support, can access services confidentially, quickly and easily and have access to 24-hour support;
- The CEO and COO of the company has overall responsibility and accountability for the safeguarding and welfare of the students;
- All staff, homestays and volunteers share in the responsibility to protect students from harm, remain vigilant in identifying safeguarding and child protection issues and to follow policies and procedures relating to safeguarding and child protection;
- Students and staff have effective means by which they can raise child protection concerns or report issues;
- Staff have at least one reliable means to contact all students quickly and directly;
- Staff are aware of the medical or learning needs of individual students via the Student Record and these are shared with the homestay on a need to know basis;
- In cases where the whereabouts of a student under Aspire Guardians is not known or the student is believed to be at risk of harm, procedures to locate the student by the safest and quickest means possible, or secure the safety of the student will be invoked immediately by following the Missing Student policy;
- The company has procedures in place that enable child protection concerns and incidents to be dealt with promptly and effectively and in line with relevant legislation.

Aspire Guardians is committed to the protection of all children in its care. We are committed to safeguarding student welfare and undertake rigorous checks on all who work with us and we expect all staff, volunteers and homestays to share this commitment.

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

Where there is a safeguarding concern Aspire Guardians will ensure the child's wishes and feelings are taken into account. We provide clear information for students in the student handbook. We check that students understand the information and are comfortable about how they can raise a concern. We explain how concerns will be treated seriously, and that students can safely express their views and give feedback.

All staff and homestays should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

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

- Child sexual exploitation
- Child on child abuse
- Radicalisation and extremism
- Female genital mutilation
- Physical, emotional, sexual abuse or neglect
- Domestic abuse
- Online abuse
- Bullying and cyber bullying

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, Aspire Guardians undertakes the following:

1. We ensure that our CEO and COO have the appropriate safeguarding knowledge and involvement in the procedures we have in place. This includes having oversight of arrangements.
2. Training is provided for all staff and homestays to a level appropriate for their role (see training section below);
3. We promote an environment of trust, openness and clear communication between students, school and Aspire Guardians staff and our Homestays, so that student welfare, safety and pastoral care is recognised as the top priority;
4. We respond to any reported allegation or suspicion of child abuse in accordance with the Aspire Guardians procedures as outlined below;
5. We ensure that all guardianship personnel, homestays and personnel offering outsourced services who come into direct contact with students in our care, are recruited using safer recruitment practices and are formally screened through the completion of an enhanced DBS check;
6. We maintain links with the appropriate agencies who have a statutory responsibility to deal with child welfare and child protection concerns.

If you have any reason to believe that a child in your care is suffering from any form of abuse or neglect then please report it immediately in confidence to the DSL using the contact details listed in this policy.

Supporting procedures and documents

This policy is to be read in conjunction with the following policies and documents:

- Anti-bullying and (including cyber-bullying) policy
- Anti-Radicalisation Policy
- Online safety policy
- Emergency procedure (This includes information on the guardianship organisation's approach to foreseeable emergencies, such as a pandemic.)
- Low Level Concerns Policy
- Missing student Policy
- Safer Recruitment Policy
- Staff and Homestay Code of Conduct
- Whistleblowing Policy

Government Guidance

- [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101321/keeping-children-safe-in-education-2023.pdf)
- [Working together to safeguard children](https://www.gov.uk/government/consultations/working-together-to-safeguard-children)

Definitions

Term	Definition and Meaning
Safeguarding and promoting the welfare of children	is defined as: <ul style="list-style-type: none"> • protecting children from maltreatment; • preventing impairment of children's mental and physical health or development; • ensuring that children grow up in circumstances consistent with the provision of safe and effective care; • taking action to enable all children to have the best outcomes.
Child Protection	Is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Designated Safeguarding Lead (DSL)	This is the person identified as taking the lead in safeguarding matters in an organisation. This person (and any deputy) will be trained to a higher level.
Prevent	Prevent is the name given to part of the government's strategy to prevent terrorism by reducing the possibility of radicalisation.
Local Safeguarding Partnership (LSP)	Formerly Local Safeguarding Children Board (LSCB) and consisting of the local authority, the clinical commissioning group within the local

	authority and the chief office of police within the local authority.
LADO	The role of the Local Authority Designated Officer (LADO) is to coordinate all allegations and concerns made against a person who works with children.
Children	'Children' includes everyone under the age of 18.

What is Abuse and Neglect?

- Knowing what to look for is vital to the early identification of abuse and neglect. All staff and homestays should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff or homestays are unsure, they should always speak to the DSL (or DDSL).
- All staff and homestays should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.
- Contextual Safeguarding: All staff, volunteers and homestays should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the guardianship organisation, school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputy) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- All staff and homestays should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Types of Abuse and Neglect

(Taken from Keeping Children Safe in Education 2023)

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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by 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 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 cyberbullying), 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.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Sexual abuse is not solely perpetrated by adult males. 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 in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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, for example, 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

(For specific types of abuse, please see the additional information at the end of this policy).

Signs of Abuse and Neglect

The following information has been taken from the NSPCC website [Types of Child Abuse & How to Prevent Them | NSPCC/](#). (This website page also includes further details on other specific signs of abuse including bullying and cyberbullying, child sexual exploitation, child

trafficking, criminal exploitation and gangs, domestic abuse, FGM, grooming, non-recent abuse, and online abuse.)

Common Signs

The NSPCC list the following as common signs that there may be something concerning happening in a child's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body

These signs don't necessarily mean that a child is being abused, there could be other things happening in their life which are affecting their behaviour – but we can help you to assess the situation.

You may also notice some concerning behaviour from adults who you know have children in their care, which makes you concerned for the child/children's safety and wellbeing.

Indicators of Physical Abuse

Bumps and bruises don't always mean a child is being physically abused. All children have accidents, trips and falls. And there isn't just one sign or symptom to look out for. But it's important to be aware of the signs.

If a child regularly has injuries, there seems to be a pattern to the injuries or the explanation doesn't match the injuries, then this should be reported.

Physical abuse symptoms include:

- bruises
- broken or fractured bones
- burns or scalds
- bite marks

It can also include other injuries and health problems, such as:

- scarring
- the effects of poisoning, such as vomiting, drowsiness or seizures
- breathing problems from drowning, suffocation or poisoning

Head injuries in babies and toddlers can be signs of abuse so it's important to be aware of these. Visible signs include:

- swelling
- bruising
- fractures
- being extremely sleepy or unconscious
- breathing problems
- seizures

- vomiting
- unusual behaviour, such as being irritable or not feeding properly

Indicators of Emotional Abuse

There might not be any obvious physical signs of emotional abuse or neglect. And a child might not tell anyone what's happening until they reach a 'crisis point'. That's why it's important to look out for signs in how a child is acting.

As children grow up, their emotions change. This means it can be difficult to tell if they're being emotionally abused. But children who are being emotionally abused might:

- seem unconfident or lack self-assurance
- struggle to control their emotions
- have difficulty making or maintaining relationships
- act in a way that's inappropriate for their age

The signs of emotional abuse can also be different for children at different ages.

Children might:

- use language you wouldn't expect them to know for their age
- act in a way or know about things you wouldn't expect them to know for their age
- struggle to control their emotions
- have extreme outbursts
- seem isolated from their parents
- lack social skills
- have few or no friends.

Indicators of Sexual Abuse

Knowing the signs of sexual abuse can help give a voice to children. Sometimes children won't understand that what's happening to them is wrong or they might be scared to speak out. Some of the signs you might notice include:

Emotional and Behavioural signs

- Avoiding being alone with or frightened of people or a person they know
- Language or sexual behaviour you wouldn't expect them to know
- Having nightmares or bed-wetting
- Alcohol or drug misuse
- Self-harm
- Changes in eating habits or developing an eating problem

Physical Signs

- Bruises
- Bleeding, discharge, pains or soreness in their genital or anal area
- Sexually transmitted infections
- Pregnancy

If a child is being or has been sexually abused online, they might:

- spend a lot more or a lot less time than usual online, texting, gaming or using social media
- seem distant, upset or angry after using the internet or texting

- be secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet
- Children and young people might also drop hints and clues about the abuse

Indicators of Neglect

Neglect can be really difficult to spot. Having one of the signs doesn't necessarily mean a child is being neglected. But if you notice multiple signs that last for a while, they might show there's a serious problem. Children and young people who are neglected might have:

Poor Appearance and Hygiene

- being smelly or dirty
- being hungry or not given money for food
- having unwashed clothes
- having the wrong clothing, such as no warm clothes in winter

Health and Development Problems

- anaemia
- body issues, such as poor muscle tone or prominent joints
- medical or dental issues
- missed medical appointments, such as for vaccinations
- not given the correct medicines
- poor language or social skills
- regular illness or infections
- repeated accidental injuries, often caused by lack of supervision
- skin issues, such as sores, rashes, flea bites, scabies or ringworm
- thin or swollen tummy
- tiredness
- untreated injuries
- weight or growth issues

Housing and Family Issues

- living in an unsuitable home environment, such as having no heating
- being left alone for a long time
- taking on the role of carer for other family members

Change in Behaviour

- becoming clingy
- becoming aggressive
- being withdrawn, depressed or anxious
- changes in eating habits
- displaying obsessive behaviour
- finding it hard to concentrate or take part in activities
- missing school
- showing signs of self-harm
- using drugs or alcohol

Procedures

When new staff, volunteers or homestays join our organisation, they are informed of the safeguarding arrangements in place, the name of the DSL and how to share concerns with them. Please note that the usual reporting channel is via the DSL, however anyone can make a referral direct to the LSP or LADO. The contact details are included in this document.

Actions to be followed if there are concerns about a child or young person

- All staff members and homestays have a duty to identify and respond to suspected / actual abuse or disclosures of abuse. Any member of staff, volunteer or homestays who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the DSL.
- Where there is risk of immediate harm, concerns will be referred immediately by telephone to the school or host's local LSP or the Police.
- Less urgent concerns or requests for support, including for Early Help, will be sent by the DSL to the school or host's local LSP via email.
- The DSL may also seek advice from Social Care or another appropriate agency about a concern, if we are unsure how to respond to it.
- The DSL will refer any safeguarding concerns that relate to an incident in school to the school. Concerns will be referred to the school DSL. If an allegation is made against a member of school staff, the guardianship organisation will check the school policy to see who to refer such matters to. This is usually the Head of the School. If the allegation involves the Head, then usually the chair of governors should be informed.
- Where a concern is not seen to reach the threshold for a referral, the DSL will keep the concern on file and will monitor the situation. Should the concern escalate, a referral will be made to the LSP.
- Wherever possible, we will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to consult with the LSP and/or Police for advice on when to share information with parents / carers.
- If a member of staff or homestay continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, the staff member or homestay concerned should press for reconsideration of the case with the designated safeguarding lead.
- If, for any reason, the DSL is not available, or you do not feel that your concern is being taken seriously, this should not delay appropriate action being taken. Any individual may refer to the LSP or Police where there is suspected or actual risk of harm to a child. The contact details are included at the beginning of this policy.
- Full records of reports and action taken will be maintained by the DSL and securely stored in a specific safeguarding file.

How Aspire Guardians will respond to child on child Abuse

All staff and homestays should be aware that children can abuse other children (often referred to as child on child abuse) and that it **can** happen both inside and outside of school

or college and online. That may mean it happens whilst students are in the care of homestays. It is important that all staff and homestays recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

All staff and homestays should understand, that even if there are no reports in their organisation it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff or homestays have **any** concerns regarding child on child abuse they should speak to the designated safeguarding lead (or deputy).

Aspire Guardians adopts a zero- tolerance to abuse. It is essential that **all** staff and homestays understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. It is recognised that it is more likely that girls will be victims and boys’ perpetrators, but all child on child abuse is unacceptable and will be taken seriously.

Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Aspire Guardians has the following procedures that help to minimise the risk of child on child abuse:

- Regular training for staff and homestays
- Educating students through our handbooks and through discussion
- Providing students with clear guidelines within the student handbook on how to raise a concern.

- Fostering effective channels of communication so that students feel comfortable approaching their homestay carer or guardian with any concerns.
- Effective communication between the DSL with the DSL in schools where students are placed.

In the event of a report of child on child abuse, staff and homestays should inform the DSL as soon as possible.

How Students can Raise a Concern

- It is important that students understand that any concern they raise will be treated seriously.
- Students will be encouraged to talk to any trusted adult, including school staff, their parents, homestay carer, their guardian or the guardianship organisation DSL. This will be explained to them verbally, with a written reminder included in the student handbook.

How Allegations will be Recorded, Investigated and Dealt With

- All reports of child on child abuse will be made on a case by case basis with the DSL (or the DDSL) taking a leading role using their professional judgement and supported by other agencies such as social care or the police as required.
- Aspire Guardians asks staff and homestay to follow the procedures outlined within this policy for [receiving a disclosure from a child or young person](#) and for [actions to be followed if there are concerns about a child or young person](#).
- Where a report includes an online element Aspire Guardians will follow advice on searching, screening and confiscation. Staff or homestays must not view or forward images unless unavoidable and only if another member of staff (preferably the DSL) is present. (The publication [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) section 2.10 explains the procedure to follow if it is felt that there is a clear reason to view such imagery.)
- The DSL will notify the DSL of the school that the student attends as soon as possible.

Risk Assessment

When there has been a report of sexual violence, the DSL (or DDSL) will make an immediate risk and needs' assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs' assessment should consider:

- The victim, especially their protection and support;
- The alleged perpetrator; and
- All the other children (and, if appropriate, homestay family members) residing at a homestay, especially any actions that are appropriate to protect them;

Risk assessments will be recorded securely and electronically and be kept under review.

The DSL (or a DDSL) will ensure they are engaging with their LSP.

How Victims, Perpetrators and any Other Children Affected by Child on Child Abuse will be Supported

- Aspire Guardians will support students who have been involved in child on child abuse.
This could include:

- o Maintaining regular contact with the student/s to check on their welfare and provide an opportunity to talk.
- o Providing homestays and staff information on a need-to-know basis so that they are able to offer support where appropriate.
- o Working with the student's school to provide consistent support
- o Making available the details of charities and helplines who can help students who have been affected by child on child abuse.

Management of the Report

The DSL will decide how any cases of child on child abuse should be managed, in line with LSP thresholds. Depending on the severity, a report may be handled in the following ways:

- Manage internally (including liaising with the students' school DSL where appropriate)
- Early help
- Report to the LSP: Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to the LSP.
- Report to the police. Where a report of rape, assault by penetration or sexual assault is made, Aspire Guardians will consult with the police regarding how this case should be managed.

Aspire Guardians expects all staff and homestays to be clear on the policy and procedures with regards to child on child abuse outlined in this policy and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Aspire Guardians acknowledges that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Allegations of Abuse Against a Member of Staff or Homestay

Allegations That Meet the Threshold

- This guidance should be followed where it is alleged that anyone working, volunteering or hosting students for Aspire Guardians has:
 - o behaved in a way that has harmed a child, or may have harmed a child and/or;
 - o possibly committed a criminal offence against or related to a child and/or;
 - o behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
 - o behaved or may have behaved in a way that indicates they may not be suitable to work with children (known as transferable risk)
- In the event that there is an allegation against a member of staff, volunteer or homestay, Aspire Guardians will follow the guidance in the most recent version of Keeping Children Safe in Education Part 4.
- Allegations against a member of guardianship organisation staff, volunteers or homestays should be directed to the DSL or CEO of Aspire Guardians who will act as "case manager". The DSL or CEO must contact the LADO immediately and follow

their advice. They **must not** investigate themselves before contacting the LADO. If the allegation is about the DSL or CEO, please contact the LADO directly.

- Aspire Guardians will report promptly to the DBS any person whose services are no longer used for regulated activity because they have caused harm or posed a risk of harm to a child.
- Any historical allegations should be referred to the police if they are made by an adult. If they are made by a child, they should be reported to the LADO.

Allegations That do not Meet the Threshold

Low level concerns: Aspire Guardians has a Low Level Concerns policy that outlines the processes we will follow to deal with concerns (including allegations) which do not meet the harm threshold set out above. We also have a staff code of conduct that explains professional boundaries. Staff, homestays and volunteers are expected to act within these boundaries, and in accordance with the ethos and values of Aspire Guardians. It is imperative that staff understand the importance of reporting any concerns that they may have.

Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a student, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

The safety and wellbeing of students in our care is dependent on the vigilance of all our staff, volunteers and homestays and their prompt communication to the DSL or CEO of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. Aspire Guardians is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside our care. The notification and prompt handling of all concerns about adults is fundamental to safeguarding students. It helps to

identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Our separate Low Level Concern Policy outlines how we will manage and record any low level concerns and take appropriate action to safeguard children.

Learning Lessons

Throughout the process of handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to our procedures to help prevent similar events in the future.

This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated.

The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

How to Receive a Disclosure From a Child or Young Person

- Victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment
- Reassure the child and listen carefully – it is important that they know you believe them
- Do not say you will not say anything to anyone – in fact you have a duty to disclose this to another person so do not promise confidentiality
- Make sure you take detailed notes, write everything down. If you are unable to take notes at the time, you should do so as soon as you are able.
- Ask open questions if appropriate, do not lead the conversation to find out what has happened. Use words such as tell me, explain or describe, and allow the student to speak
- Avoid words such as what, why, how when – these will be asked by the relevant agency if appropriate
- Ensure that you notify the police by calling 999 if you believe that the young person is at immediate or serious risk of harm
- Contact the DSL Suki Thomas as soon as practicable and in any case within 24 hours
- If the disclosure is made out of hours, please use the emergency phone number +44 7542 181 244.

Sharing Safeguarding Information

There will be occasions when safeguarding information will need to be shared with other parties in order to safeguard the individual/s concerned. Information will be shared with guardianship organisation staff, homestays and the school's DSL (of the school that the student attends) who 'need to know' and with children's social care, the safeguarding

partners, other organisations, agencies, and practitioners as required. Staff and homestays must ensure that any confidential information shared with them remains confidential and is handled in line with our data protection policy.

Aspire Guardians will be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

All staff and homestays must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff and homestays must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff and homestays are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the DSL (or DDSL) will only disclose information about a child to other members of guardianship organisation staff, homestays or the DSL of the school that the student attends on a need-to-know basis.

The DSL will always undertake to gain parent/carers consent to refer a child to Social Care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

Role of DSL (and DDSL)

The DSL will take lead responsibility for safeguarding and child protection (including online safety). This is explicit in the role holder's job description. This person has the appropriate status and authority within the guardianship organisation to carry out the duties of the post.

The DDSL is trained to the same standard as the DSL and the role is explicit in their job description.

Expectations of the Designated Safeguarding Lead

The Designated Safeguarding Lead is Expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff and homestays who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required (this may also be undertaken by the Prevent Lead, if the Prevent Lead is not the DSL);
- support staff and homestays who make referrals to the Channel programme (this may also be undertaken by the Prevent Lead, if the Prevent Lead is not the DSL);
- refer cases where a crime may have been committed to the Police as required.
- act as a point of contact with the three safeguarding partners;
- liaise with the CEO to inform them of issues

- liaise with staff and homestays on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- act as a source of support, advice and expertise for all staff and homestays.
- understand the importance of information sharing, both within the guardianship organisation, and with the safeguarding partners, the DSL for the school the student attends, other agencies, organisations and practitioners
- encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, homestays and volunteers and in any measures the guardianship organisation may put in place to protect them; and,
- understand the difficulties that students may have in approaching staff and homestays about their circumstances and consider how to build trusted relationships which facilitate communication.
- ensure the guardianship organisation's child protection policies are known, understood and used appropriately;
- ensure the child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the CEO, COO and CCO regarding this;
- ensure the child protection policy is available for all relevant parties;
- link with the safeguarding partner arrangements to make sure staff and homestays are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Contact Details for the DSL

Role	Name	Telephone Number	Email
DSL	Suki Thomas	+44 7542 181 244	sthomas@aspireguardians.com
24-Hour emergency contact	Aspire Guardians	UK: +44 7542 181 244 HK + 852 5978 6168	N/A

Prevent

Aspire Guardians has a separate policy that outlines our procedure for Anti-Radicalisation and Prevent. This can be requested via email info@aspireguardians.com or on the website.

Prevent Lead Contact Details

Role	Name	Telephone Number	Email
Prevent Lead	Suki Thomas	+44 7542 181 244	sthomas@aspireguardians.com

Record Keeping

Aspire Guardians will keep full records of any safeguarding concern reported to them. All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Safeguarding records will be stored securely and separately to the

general student files. These will be stored confidentially by the DSL in either a locked cabinet (hard copies) or a password protected file. Only the DSL (or DDSL) will have access to these files.

Records will be detailed and accurate (either handwritten or using appropriate secure online software). These will include all concerns about a student even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.

In summary, records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

Copies of any correspondence or notes from conversations with the LSP, school DSL or other external agency will be included in the file.

Aspire Guardians will ensure that the indication of the existence of the additional child protection file is marked on the student file record. Information will only be shared in a need-to-know basis in order to safeguard the student.

If in doubt about recording requirements, staff or homestays should discuss with the DSL (or DDSL).

Training and updates

Aspire Guardians will ensure that all staff and homestays receive training and regular updates that are suitable for their roles. A formal record of all safeguarding training will be kept.

DSL

The DSL will attend suitable face-to-face training. If training is completed online, it will be via a live course. This training will be renewed every two years.

Other Staff and Homestays

All other members of staff, volunteers and Homestays will receive appropriate safeguarding training to an appropriate basic awareness level (previously referred to as level 1), every three years. This will either be done online or in person. Members of staff, volunteers and Homestays who have already completed suitable safeguarding training for another provider that is still in date will not be required to re-train. In this case the DSL will still need to ensure that the person fully understands Aspire Guardian's own procedures for safeguarding.

All staff and homestays will receive regular safeguarding updates, at least once per year – normally in September. These will be given by the DSL.

Whistleblowing

Aspire Guardians has a separate policy that outlines the whistleblowing procedures. These protect staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.

Local Safeguarding Partnerships (LSPs)

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

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

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

Details can be found on the Local Authority website and for the areas Aspire Guardians operates in the table below.

In the event of any contact information difficulties then Aspire Guardians will call the police as they are one of the partners.

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

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

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

The company is aware that in **Wales** for a non-emergency referral or concern they can contact the local child protection services. Their contact details can be found on the website for the local authority the child lives in, and on the table below.

Contact Details for LSP and LADO where Aspire Guardians is located

Role	Name	Telephone Number	Email
LSP	Bath & North East Somerset Community Safety and Safeguarding Partnership	01225 396312 or 01225 396313	N/A
LADO	BCSSP	999 Emergency Duty Team 01454 615165	LADO@bathnes.gov.uk.

Contact Details for LSPs and LADOs across the areas that Aspire Guardians operates (Currently N/A)

Area	Role and Name of contact	Telephone Number	Email
e.g.Surrey	LSP:		
	LADO:		
	LSP:		
	LADO:		

Liaison with Parents / Agents and Partner Schools

- The guardianship organisation may be required to share confidential safeguarding information with the DSL of the school or college that the student attends. When a student moves school or college, safeguarding information may be shared with the DSL of the new school. All schools and colleges have their own safeguarding and child protection policies that outline their procedures. These can be found on their websites.
- Whilst the guardianship organisation will work openly with parents as far as possible, it reserves the right to contact the LSP or the police, without notifying parents if this is believed to be in the child's best interests.
- Aspire Guardians will not usually share safeguarding information with agents unless it is necessary to safeguard the student. In this case information will be provided on a need-to-know basis and on the understanding that it should be kept strictly confidential.

Further Detail on Specific Types of Abuse

The following information is taken from Keeping Children Safe in Education. It has been edited so that where appropriate, references to schools and colleges has been replaced with reference to guardianship organisations. This is to make it more relevant to the reader. Please refer to annex B of [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101311/keeping-children-safe-in-education-2023.pdf) for further details, including additional types of abuse.

Safeguarding Issues

All staff and homestays should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues staff and homestays should be aware of include:

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking in

sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Different forms of harm often overlap, and perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: definition and guide for practitioners - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/672222/Child_sexual_exploitation_definition_and_guide_for_practitioners_-_GOV.UK.pdf)

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Further information about CCE including definitions and indicators is included in Annex B of Keeping Children Safe in Education.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Mental Health

All staff and homestays should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Guardianship staff and homestays, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff and homestays are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

Guardianship organisations can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. The AEGIS Quality Standards includes a Mental Health Support List (Appendix 10). More information can be found in the mental health and behaviour in schools guidance, guardianship organisations may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. This may be of use to guardianship organisations. See [Every Mind Matters](#) for links to all materials and lesson plans.

If staff or homestays have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

There may be instances where Aspire Guardians is asked to remove a student with mental health issues from a school setting. Aspire Guardians will work with the students' school to support the student in the best way possible.

In the event of a request to remove a student with a mental health issue from school, Aspire Guardians will ask a member of school staff to complete and return the student removal form (see appendix 2) before removing the student from the school. This is to ensure that Aspire Guardians has enough information about the circumstances leading up to the removal of the student in order to support the student suitably, and to ensure all appropriate steps have been taken up to that point.

Sexual Violence and Sexual Harassment Between Children in Schools and Colleges

Context

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are

creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of the full version of KCSIE.

Staff and homestays should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff and homestays should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual Violence and Sexual Harassment?

Sexual Violence

It is important that guardianship organisation staff, homestays and any volunteers are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003/135 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is Consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: [Rape Crisis England & Wales -Sexual consent](#)

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

Sexual Harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - o consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. As set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
 - o sharing of unwanted explicit content;
 - o upskirting (is a criminal offence);
 - o sexualised online bullying;
 - o unwanted sexual comments and messages, including, on social media;
 - o sexual exploitation; coercion and threats.

Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification,

or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

The Response to a Report of Sexual Violence or Sexual Harassment

The initial response to a report from a child is incredibly important. How a school, college or guardianship organisation responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools, colleges and guardianship organisations not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff or homestays have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 51 in Part one of Keeping Children Safe in Education. As is always the case, if staff or homestays are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

Serious Violence

All staff and homestays should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).

All staff and homestays should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance. This is also useful advice for guardianship organisations.

Children Who are Absent from Education

All staff and homestays should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should contact the students' school or college should they suspect a student is missing from education. The school or college will have a procedure for reporting this absence.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office](#).

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. [Modern slavery: how to identify and support victims - GOV.UK \(www.gov.uk\)](#)

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [Cyber Choices](#), [‘NPCC- When to call the Police’](#) and [National Cyber Security Centre - NCSC.GOV.UK](#)

So-Called ‘honour’-based abuse (including Female Genital Mutilation and Forced Marriage)

So-called ‘honour’-based abuse (HBA) 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 this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA 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 HBA, or already having suffered HBA.

Actions

If staff or homestays have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see annex B of Keeping Children Safe in Education for further details).

FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Whilst all staff or homestays should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers (and also regulated health and social care professionals in England and Wales). If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. See Annex B of Keeping Children Safe in Education for further details.

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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools, colleges and guardianship organisations can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/the-right-to-choose-government-guidance-on-forced-marriage) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Domestic Abuse

Domestic abuse The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Guardianship organisation should be aware that students could potentially experience domestic abuse both in their own homes or whilst staying with homestays.

Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If Aspire Guardians feels our students or staff are at risk, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Aspire Guardians recognises the risks posed to students online. Further information can be found in the online safety and bullying (including cyber-bullying) policies.

Aspire Guardians provides training for staff, homestays and volunteers on online safety.

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 31 March 2024

Appendix 1: Incident Form

CHILD PROTECTION RECORD – Report of a Concern

Date of record:	
Date of incident:	

Name of referrer:		Role of referrer:	
Student name:			
Details of concern:	<ul style="list-style-type: none"> • use initials for other children / young people involved, unless there is a specific need to name them in full • contemporaneous notes, if taken, may be attached to this form 		
Reported to:		Role of person reported to:	
Signed:			

For DSL use:

Action taken:		Advice sought: (from whom and what was advice given)	
Concern / referral discussed with parent / carer?		If not, state reasons why – if yes, note discussion with parent	
Referral made:		If not, state reasons why – if yes, record to whom and any action agreed	
Feedback to referring member of staff or homestay:			By whom
Response to / action taken with student:			By whom
Name and contact number of key workers:			
Name and contact details of GP:			
Other notes / information / concerns:			
Any other action required:			

Appendix 2: Student Removal Form

In order for us to support our student as best as possible, we would appreciate it if you could complete the following student removal form. Please note that a representative of Aspire Guardians will not be able to collect the student until this form has been completed and returned to us by email: info@aspireguardians.com

School Name	
Student Name	
Date of Birth	
Reason for request of removal of student	
<p>Has the student been assessed by a medical professional?</p> <p>Date of assessment if applicable.</p> <p>Please provide a summary of assessment if applicable.</p>	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p>
Is the student at risk of harm to themselves?	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p>
Is the student a risk to others?	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p>
<p>Has the school followed its mental health and child protection policies and procedures?</p> <p>Please provide a copy of any relevant policies and procedures.</p>	<p>Yes <input type="checkbox"/></p> <p>No <input type="checkbox"/></p>
Any other additional information we should be made aware of	
Signature	
Name	

Position	
Date	

Appendix 3

Whistleblowing Policy

Policy Statement

Aspire Guardians is committed to the highest standards of transparency, integrity and accountability in its inspection and accreditation work and the sharing of best practice in guardianship of international students. Concerns about poor practice within Aspire Guardians should usually be dealt with through the Aspire Guardians complaints procedure, found on the Aspire Guardians website. However serious allegations may be raised by following the whistleblowing policy. It is the duty of all staff members of Aspire Guardians and those associated with Aspire Guardians, to raise any concerns so that improvements can be made. Raising concerns will not result in reprisals in any form. This policy is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged. This policy does not replace other policies and procedures such as the Aspire Guardians Complaints Procedure. This procedure applies to all Aspire Guardians employees and also includes associates, contractors, and schools. If an employee has a concern about the conduct of a fellow employee in the working environment (e.g. that they are not treating colleagues with respect) they should raise this with their line manager, or if that is not possible, with the Chief Executive Officer.

Policy

This procedure applies to, but is not limited to, allegations about any of the following:

- Conduct which is an offence or breach of the law
- Alleged miscarriage of justice
- Serious Health and Safety risks
- The unauthorised use of public funds
- Possible fraud and corruption
- Sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or service users
- Abuse of authority
- Concerns about how child protection issues are being handled in the organisation
- Other unethical conduct

Reporting

Aspire Guardians recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty to those for whom Aspire Guardians is providing a service (international students). Aspire Guardians will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless requested by the whistleblower. Aspire Guardians will not,

without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation. Sometimes the whistleblower might be asked to give a statement as part of the investigation, in which case their identity may have to be revealed.

Anonymous allegations

This policy encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of the Chief Executive Officer. In exercising discretion to accept an anonymous allegation the factors to be taken into account:

- The seriousness of the issue raised
- The credibility of the allegation; and
- Whether the allegation can realistically be investigated from factors or sources other than the complainant

Untrue allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

Procedure for Making an Allegation

It is preferable for allegations to be made to, for example, an employee's immediate manager to whom they report. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the whistleblower believes that management is involved it would be inappropriate to raise it directly with them. The whistleblower may then make an allegation direct to any of the following:

- The NSPCC whistleblowing helpline. Telephone number 0800 028 0285 between 8am and 8pm Monday to Friday or email help@nspcc.org.uk
- Protect provide a free, confidential advice line for concerned staff to call before whistleblowing. The helpline is 020 3117 2520 and their website is: www.protect-advice.org.uk
- AEGIS Telephone number 01453 821 293 or email yasemin@aegisuk.net

Allegation

Whether a written or oral report is made it is important that relevant information is provided including:

- The name of the person making the allegation and a contact point.
- The background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- The specific reason for the allegation.

Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

Action on receipt of an allegation

The line manager will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- The record of the allegation;
- The acknowledgement of the allegation;
- Any documents supplied by the whistleblower

The investigator will ask the whistleblower for their preferred means of communication and contact details and use these for all communications with the whistleblower in order to preserve confidentiality.

If the allegation relates to fraud, potential fraud or other financial irregularity the Chief Executive Officer will be informed within 5 working days of receipt of the allegation. The Chief Executive Officer will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of a criminal offence, it will immediately be reported to the Chief Executive Officer and a decision will be made as to whether to inform the Police or appropriate authorities.

Timetable

An acknowledgement of the allegation in writing within 10 working days with:

- An indication of how Aspire 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.
- Information on whistleblower support mechanisms.
- Indication whether further investigations will take place and if not, why not.

Where the allegation has been made internally and anonymously, obviously Aspire Guardians will be unable to communicate what action has been taken.

Support

Aspire Guardians will take steps to minimise any difficulties which may be experienced as a result of making an allegation. For instance, if a whistleblower is required to give evidence in criminal or disciplinary proceedings Aspire Guardians will arrange for them to receive advice about the procedure and advise on the support mechanisms that are available.

Aspire Guardians accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

Responsibility for the procedure

The Chief Executive Officer has overall responsibility for the operation of this procedure and for determining the administrative processes to be followed and the format of the records to be kept.

Monitoring

A Register will record the following details:

- The name and status (e.g. employee) of the whistleblower
- The date on which the allegation was received
- The nature of the allegation
- Details of the person who received the allegation
- Whether the allegation is to be investigated and, if yes, by whom
- The outcome of the investigation
- Any other relevant details

The Register will be confidential and only available for inspection by the Directors.

Further information and advice can be found here: [Whistleblowing for employees: What is a whistleblower - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/whistleblowing-for-employees-what-is-a-whistleblower)

Contact details

Chief Executive Officer - info@aspireguardians.com - +852 5978 3330 - 12/F Hang Seng Building, 28 Yee Wo Street, Causeway Bay, Hong Kong

Review

We are committed to reviewing our policy and good practice annually.
This whistleblowing policy was last reviewed on: 31 March 2024

Appendix 4

Aspire Guardians Data Protection Policy

Table of Contents

1. Introduction and purpose	3
2. Scope	3
3. Definitions	3
4. Roles and responsibilities	3
5. Data protection principles	4
6. Keeping personal information secure	6
7. Managing personal data breaches	7
8. Responding to requests from individuals ('rights of data subjects')	8
9. Document retention	8
10. Data protection by design and default	9
11. Data processors	9
12. Record of processing activities	9
13. Data Protection Impact Assessments (DPIAs)	9
14. Appointment of a Data Protection Officer	10
15. AEGIS	10
16. Policy review	10

1. Introduction and purpose

This policy outlines our approach to handling personal information in accordance with the UK General Data Protection Regulation 2016 and the Data Protection Act 2018.

For the purposes of this policy, Aspire Guardians is the data controller, and we are registered with the Information Commissioner's Office (ICO) under registration number is ZB672925 .

The purpose of this Policy is to explain how we handle personal information under the relevant data protection laws and to inform employees and other individuals who process personal information on our behalf, of our expectations in relation to this.

2. Scope

This policy applies to the processing of personal information that is held by Aspire Guardians. This includes personal information about employees, volunteers, parents, students, homestays, visitors, and any other individuals who engage with us.

This policy should be read in conjunction with the Aspire Guardians Privacy Policy.

3. Definitions

The following terms are used throughout this policy and it is important that you understand what they mean:

- Personal data: Any information relating to a person who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.
- Data subject: the identified or identifiable living individual to whom personal data relates
- Controller: A person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- Processor: A person or organisation which processes personal data on behalf of the controller, and in accordance with their instructions.
- Processing: This is anything that you do with data, including collecting, recording, storing, using, analysing, combining, disclosing, or deleting it.
- Special category data: This is personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. It also includes genetic data, biometric data, and data concerning a person's health, their sex life, and sexual orientation.

4. Roles and responsibilities

Aspire Guardians is the data controller, and we are responsible for complying with the UK GDPR.

Responsibility

The Chief Executive Officer has day-to-day responsibility for ensuring that this policy is implemented, adopted and adhered to by employees and all other individuals who process personal information on behalf of Aspire Guardians.

Employees

All employees and any other individuals who process personal information on behalf of Aspire Guardians, are responsible for complying with this policy in its entirety.

Failure to comply with this policy may result in disciplinary action being taken, or the termination of an employment contract.

5. Data protection principles

The UK GDPR sets out several key principles which govern how Aspire Guardians handles personal information. Complying with these principles helps us to ensure that we comply with the law, and that our practices in relation to data protection are good.

The principles state that personal information must be:

- Processed in a way that is lawful, fair, and transparent (“lawfulness, fairness, and transparency”)
- Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes (“purpose limitation”)
- Adequate, relevant, and limited to what is necessary (“data minimisation”)
- Accurate, and where necessary, kept up to date (“accuracy”)
- Kept for no longer than is necessary (“storage limitation”)
- Processed in a way that ensures it is safe and secure, by means of appropriate technical and organisational measures (“integrity and confidentiality”)

The UK GDPR requires us to be able to evidence that we are complying with these principles. This is called the “accountability principle”.

Lawfulness, fairness, and transparency

We only process personal information where there is a lawful basis for doing so. The lawful bases are as follows:

- Where the data subject has given us their consent to the processing
- Where processing is necessary for the performance of a contract, or to enter into a contract, with the data subject
- Where processing is necessary to comply with a legal obligation that we are subject to
- Where processing is necessary to protect the vital interests of the data subject or another person
- Where processing is necessary for the performance of a task carried out in the public interest
- Where processing is necessary for the purposes of the legitimate interests pursued by Freedom Aspire Guardians or by a third party, except where such rights are overridden by the interests or fundamental rights and freedoms of the data subject

We will only process special category data where a lawful basis has been identified from the list above, plus one from the following list:

- The data subject has given us their explicit consent
- The processing is necessary for the purposes of exercising or performing any right or obligation which is imposed on Aspire Guardians in relation to employment, social security, and social protection law
- The processing is necessary to protect the vital interests of the data subject or another person, where the data subject is physically or legally incapable of giving consent
- The processing is necessary for the establishment, exercise, or defence of legal claims
- The processing is necessary for reasons of substantial public interest
- The processing is necessary for the assessment of the working capacity of an employee

The principle of fairness means that personal information should be used in a way that the data subject would reasonably expect.

The UK GDPR defines 'consent' as "any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her".

When we rely on consent as the basis for processing personal information, we will ensure that the data subject is able to withdraw their consent as easily as they gave it, and at any time.

We will always use the most appropriate basis for processing personal information.

The principle of transparency requires us to ensure that any information provided by us to data subjects about how their personal information will be processed, is concise, easily accessible, easy to understand, and written in plain language.

Purpose limitation

We will be clear from the very beginning as to why we are collecting personal information and what we intend to do with it.

We will only collect personal information for specified, explicit, and legitimate purposes, and we will not process information in any way that is incompatible with those purposes.

If things change, and we intend to use personal information for a different purpose, we will make sure that the new use is fair, lawful, and transparent. We will always inform data subjects before we use their personal information for a new purpose, and where the lawful basis relied upon for the original purpose was consent, we will obtain such consent again.

Data minimisation

The personal information that Aspire Guardians collect and processes will be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is to be processed.

Accuracy

The personal information that Aspire Guardians collects and processes will be accurate and, where necessary, kept up to date, and will be corrected or deleted without delay when we are notified that the information is inaccurate.

All employees are required to update all relevant records if they become aware that any personal information is inaccurate.

Storage limitation

We do not keep personal information for longer than we need it.

We carefully consider how long we keep personal information for, and we justify our reasons for keeping it. Most of our retention periods are determined by legal timescales. For example, personal information relating to income tax contributions.

We have a retention schedule in place which details the types of personal information we hold, the reasons for holding it, and the retention period. This schedule forms part of our Record of processing activities (please see Section 12).

We regularly review the data we hold and delete or securely destroy it when we no longer need it.

Integrity and confidentiality

We take our responsibilities under data protection laws very seriously and we will always ensure that we have appropriate security measures in place to protect the personal information we hold.

This means that we will have appropriate measures in place to protect personal information against unauthorised or unlawful processing, accidental loss, destruction, or damage.

Aspire Guardians' employees are responsible for ensuring the security of the personal information processed by them in the performance of their duties and tasks.

6. Keeping personal information secure

We have appropriate technical and organisational measures in place to ensure that we process personal information securely, and to prevent personal information we hold being accidentally or deliberately compromised.

Technical measures

- We enforce strong password policies; passwords are changed at appropriate intervals and are not shared or used by others
- We ensure that laptops, USB/memory sticks and other portable devices containing personal information are encrypted
- We have a firewall, anti-virus, and anti-malware software in place
- We restrict access to systems, so personal information is only accessible to those people who need to use it as part of their work
- Personal information held electronically is backed up on each weekday, using AES 256 password strength encryption
- Paper documents containing personal information are securely destroyed using a shredder when they are no longer required

Organisational measures

- We provide data protection awareness training to all employees during their induction and annually thereafter
- We have appropriate policies and procedures in place to ensure our employees fully understand their responsibilities under data protection laws
- We ensure that our employees and any other individuals who process personal information on behalf of Aspire Guardians, are aware of their individual responsibilities under data protection laws and how these apply to their areas of work
- We promptly investigate all suspected personal data breaches; we always make the appropriate external notifications (where applicable) and seek to learn any lessons from the incident to reduce the risk of recurrence.
- Paper documents containing personal information are securely locked away when not in use
- Paper documents containing personal information are securely destroyed using shredders when they are no longer needed
- Employees take every opportunity to ensure that the personal information we hold is accurate and kept up to date
- Employees do not disclose personal information to any unauthorised persons, both externally and within Aspire Guardians.

We regularly test, assess, and evaluate the effectiveness of the measures we have put in place, and act on the results of those tests where they highlight areas for improvement.

7. Managing personal data breaches

We have a procedure in place for managing and responding to personal data breaches.

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Examples of personal data breaches include:

- Sending personal data to the wrong person
- Access to personal data by an unauthorised third party
- Devices or equipment containing personal data being lost or stolen

All suspected personal data breaches and security incidents must be reported without delay to the CEO. All personal data breaches will be investigated promptly and recorded on our internal data breach register.

The CEO is responsible for deciding whether a personal data breach needs to be reported to the ICO and data subjects as well as notifying the ICO and other external authorities.

Notifying the ICO and other external authorities

Where a personal data breach is likely to result in a risk to the rights and freedoms of a data subject(s), we will notify the ICO within 72 hours of becoming aware of the breach.

We may be required to notify a personal data breach to other external authorities. For example, we may be required to notify the Police or a funding authority. The CEO is responsible for agreeing to all external notifications.

Notifying data subjects

Where a personal data breach is likely to result in a high risk to the rights and freedoms of a data subject(s), the CEO will communicate the personal data breach to the data subject(s) without undue delay.

When informing the data subject(s) about the breach, we will provide in clear, plain language, the following information:

- Details about the nature of the breach
- The name and contact details of the organisational point of contact, who the data subject(s) can contact if they require further information
- The likely consequences of the breach
- Measures taken, or proposed to be taken, to address the breach including measures to mitigate possible adverse effects

8. Responding to requests from individuals ('rights of data subjects')

The UK GDPR provides data subjects with a number of rights in relation to their personal information.

These are:

- The right to request a copy of the personal information we hold about them
- The right to request that inaccurate or incomplete information about them is rectified
- The right to request that their personal information is deleted
- The right to request that the processing of their personal information is restricted
- The right to data portability
- The right to object to the processing of their information
- The right to complain to the ICO if they are not happy with how their personal information has been processed, or they feel their data protection rights have been infringed

We will endeavour to respond to all requests without delay, and in any event within one month of receiving a request. There may be circumstances when we need to extend the time limit for responding to a request. We will tell the individual who has made the request if this is the case and keep them informed.

Before responding to a request, we may need to ask for further information and/or proof of the individual's identity.

There may be exceptions to the rights outlined above; each request we receive will be reviewed on a case-by-case basis.

9. Document retention

We do not keep personal information for longer than we need it.

We carefully consider how long we keep personal information for, and we justify our reasons for keeping it. Most of our retention periods are determined by legal timescales. For example, personal information relating to income tax contributions.

We have a retention schedule in place which details the types of personal information we hold, the reasons for holding it, and the retention period. This schedule forms part of our Record of processing activities (please see Section 12).

We regularly review the data we hold and delete or securely destroy it when we no longer need it.

10. Data protection by design and default

We consider data protection and privacy issues upfront in everything we do. We are required to do this under the UK GDPR.

We make sure that when we are designing and implementing a new organisational system, service, or practice, we consider the data protection issues before we begin. We also make sure, by default, that we only process personal information where it is necessary to do so.

11. Data processors

Whenever we use a third party to process personal information on our behalf, we will always undertake appropriate due diligence and ensure a data processing agreement is in place.

We only use processors that provide us with sufficient guarantees about their security measures.

12. Record of processing activities

Aspire Guardians maintains a record of its processing activities, as is required under Article 30 of the UK GDPR.

This record is held in electronic format and contains the following information:

- Our organisation name and contact details
- A description of the personal information we process
- Categories of data subjects
- Purposes of the processing
- Recipients of the personal information
- The name of any countries or organisations outside the UK that we transfer personal information to, together with information about the safeguards in place
- Retention periods
- A general description of our technical and organisational security measures e.g. encryption, access controls, and training.

We regularly review the personal information we process and update this record accordingly.

This record will be made available to the ICO, if requested.

13. Data Protection Impact Assessments (DPIAs)

A Data Protection Impact Assessment (DPIA) is a process that helps us to identify and minimise the data protection risks associated with a project, process, or activity involving the processing of personal information.

We are required to carry out a DPIA for any processing that is likely to result in a high risk to individuals. We will also carry out a DPIA for any other major project which requires the processing of personal information, because it is good practice to do so.

The DPIA will:

- Describe the nature, scope, context, and purposes of processing
- Assess necessity, proportionality, and compliance measures
- Identify and assess risks to individuals
- Identify any additional measures to mitigate those risks

We will record the outcome of the DPIA and implement the measures identified.

14. Appointment of a Data Protection Officer

Under Article 37 of the UK GDPR, controllers and processors are required to appoint a Data Protection Officer if:

- The processing is carried out by a public authority or body
- The core activities of the controller or processor consist of processing operations which require regular and systematic monitoring of individuals on a large scale
- The core activities of the controller or processor consist of processing on a large scale of special categories of data or personal data relating to criminal convictions and offences

The status of our organisation and the scope of our processing activities means that we are not required to appoint a Data Protection Officer.

We will keep this decision under review, should our processing activities change.

15. AEGIS

As part of the accreditation process, Aspire Guardians is required to send the AEGIS office a copy of the contact details for all their homestays, partner schools and parents. They will also provide the names of the students. This data is held securely by AEGIS and is destroyed once the inspection process is finished.

16. Policy review

This policy was last updated on 31 March 2024

We will review this policy on an annual basis, or when there is a change to data protection laws or our organisational policies and procedures.

Appendix 5

Missing Student Procedure

Statement

This policy is designed to be implemented in cases where students are believed to be absent or missing from the care of Aspire Guardians. The purpose of the policy is to locate the student by the safest and fastest means possible.

Aspire Guardians is committed to safeguarding and promoting the welfare of children and young people.

This policy is required to ensure that missing or absent students (who are not under the duty of care of the school), are subject to an appropriate response by Aspire Guardians. This is to ensure that children are found and returned to an approved location as soon as practicable.

The benefits of this policy are that all reports of missing/absent people will be recorded. The policy provides a model and framework for response and dealing with incidents dependent on the risk posed. This policy is applicable to all staff members who may become involved in the initial stages of a report of a missing child or young person.

Aspire Guardians will respond appropriately to reports of missing and absent persons. Every report will be risk assessed so that those who are vulnerable or represent a high risk will be immediately identified. This process shall be on-going, dynamic and supervised in each and every case with a focus on locating the person safely and mitigating any risk posed to others. Where criminality is associated with either the initial disappearance or subsequent harbouring of those who wish to remain absent, this will be reported to the police.

Aspire Guardians will liaise closely with schools following a report that a student has gone missing. Aspire Guardians is aware that some schools may wish to take the lead in the response as they retain the overall duty of care as the student's sponsor. In these cases, Aspire Guardians will cooperate fully with the school's requests. The procedure outlined in this policy assumes that the guardianship organisation is taking the lead in the response.

Definitions

Aspire Guardians' adoption of distinct definitions to determine whether someone is missing or absent is in accordance with the National Police Chiefs Council definitions (issued by ACPO in 2013).

The following definitions are included within the Local Safeguarding Children Partnership protocols:

Absent – a child or young person is not at a place where they are expected or required to be and there is no apparent risk

Missing – a child or young person whose whereabouts cannot be established and where the circumstances are out of character, or the context suggests the person may be subject of crime or at risk of harm to themselves or another.

Supporting Reference Documents

- NSPCC publications
- Working Together to Safeguard Children 2023
- Safeguarding Children and Young People from CSE 2009
- Scoping Report on Missing and Abducted Children – CEOP
- Local Safeguarding Children Board Protocols – Reporting children who go missing from care
- Statutory Guidance on children who run away or go missing from home or care – DfE 2014
- Children Missing Education
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

Procedure

This workflow applies when a young person is absent (they are not where they are supposed to be but there is no apparent risk) or when they are missing (unexpected and uncharacteristic absence which causes concern for their safety). It applies when they are under the care of Aspire Guardians during journeys around the UK organised by us or at a homestay.

The DSL – Suki Thomas shall manage any cases of absent or missing children or young people, and as such all reports must be brought to the attention of the DSL.

Contact details for the DSL

Job title	Name	Telephone/ Email
DSL	Suki Thomas	Telephone: +44 7542 181244 Email: sthomas@aspireguardians.com
24-hour emergency number (<i>out of hours</i>)	Aspire Guardians	UK +44 7542 181 244 HK + 852 5978 6168

If a child or young person goes missing out of hours and Aspire Guardians receives a report then the on-duty manager is responsible for ensuring the completion of the initial reasonable enquiries where a student is absent/missing during an event (for example half-term, exeat or during a suspension/expulsion) which will include:

- if appropriate, review the flight and transfer details (with communication to the airline and transfer company to confirm transport arrangements for the student)
- texting, emailing and phoning the student (leaving a message if no answer) asking them to make contact with the on-duty member of staff and repeating this contact every 30 minutes
- texting, emailing and phoning the house parent to collate any relevant information about the whereabouts of the student – this is only possible if the houseparent is at school
- texting, emailing and phoning the parent/agent to collate any relevant information about the whereabouts of the student

- texting, emailing and phoning the homestay to collate any relevant information about the whereabouts of the student
- texting, emailing and phoning the local coordinator (if the GO has these) to collate any relevant information about the whereabouts of the student, along with any contact details we may not be aware of
- review of information held on file which may indicate friends or associates whom the student may be with.

Any member of staff or homestay may report a child or young person as absent or missing to the police where they have genuine concerns for their safety.

Following a risk assessment, the receiving police force will record a report of absence or missing where there are grounds to do so. In cases of missing children or young people, the police will work cooperatively with Children's Social Care staff during any enquiry.

The incident lead is responsible for ensuring the school is informed of any report made to the police of an absent or missing child or young person, as the school retains the overall duty of care. The school should be updated with any developments as they should always know the whereabouts of the student, especially those on visas.

The incident lead is responsible for ensuring that the parents/agent are informed of any report made to the police of an absent or missing child or young person. The parents/agent should be regularly updated (recommended a minimum of every 4 hours) with any developments. This is to ensure that they are fully informed as to the situation involving their son or daughter.

All missing person reports are to be reviewed by the DSL as soon as practicable with subsequent ongoing daily review until the incident is resolved.

Process and Response – report of a missing child

1. A child or young person who falls into the 'Missing' Category must be reported to the police as soon as possible by telephoning 101 for a non-emergency report or 999 for an emergency response i.e. information received that a child or young person is in immediate danger of harm.

YOU WILL NEED TO ENSURE THAT YOU ARE TRANSFERRED TO THE FORCE RELEVANT TO THE AREA THE CHILD IS MISSING/ABSENT FROM.

IF CALLING 999 YOU WILL NEED TO TELL THE CALL HANDLER TO STAY ON THE LINE, WHILE YOU ARE TRANSFERRED TO THE RELEVANT FORCE.

If the report to the police is not made by the DSL, then the reporter must inform the DSL of the situation as soon as possible.

2. The DSL will ensure that the following information is gathered for the initial report to the police:
 - Name, date of birth and nationality of the child or young person;

- The specific concern for the child or young person;
- Whether they are likely to be subjected to crime, a victim of abuse or at risk of sexual exploitation;
- Whether the child or young person is likely to attempt suicide;
- Whether the child or young person is likely to pose a danger to other people;
- What actions have been completed so far to locate the child or young person;
- A description of the child or young person, including their build, hair, clothing and glasses;
- Details of when the child or young person was last seen and with whom;
- Personal details of the child or young person (including any medical conditions or ailments);
- Any previous history of absconding/absenteeism and circumstances of where found;
- The circumstances under which the child or young person is absent;
- Any factors which increase the risk to the child or young person;
- Homestay address.

Information that may be needed later to extend investigations if the young person is not located:

- A recent photograph (if available);
 - Family addresses and contact telephone numbers;
 - Known associates, telephone numbers and addresses frequented;
 - The names and addresses of the child or young person's GP and dentist;
 - The circumstances under which the child or young person is absent;
 - Any factors which increase the risk to the child or young person;
 - School and House Parent addresses and contact details
 - Details of any travel and accommodation plans authorised by the overseas parents;
 - Details of any social media accounts that may be open to the public;
3. The incident must be recorded as an incident report file with regular updates being added until the matter has been resolved. If a police report has been made, the police incident reference number must be recorded. A record of all emails should be included in the incident report file.
 4. Following the report to the police, the parents, the agent (if applicable), school and homestay must be informed and requested to contact the DSL without delay if the child or young person makes contact.

Process and Response – report of an absent child

1. If a child or young person is considered to fall within the definition of absent, the decision to record the child as such, together with the evidence supporting that decision must be recorded. The absence of a child or young person must be recorded in the Student File as an 'incident'.
2. Details of children or young people who are absent should still be notified to the police (using the non-emergency telephone number 101 or the emergency telephone number 999) in order that a record of the child or young person's absence can be made, an agreement can be reached on what needs to be done, review times and on-going actions. Although there is an expectation that Aspire Guardians should continue to make

reasonable enquiries to locate the child or young person, the police may also initiate some enquiries as appropriate.

3. Aspire Guardians' Incident Lead will notify the school and parents/agent of the incident, and regularly provide updates to both parties (minimum every 4 hours) with news of any developments, or confirmation that there have been no developments since the last update. This also affords an opportunity for the school or parents/agent to update the Incident Lead with any contact they may have had from the student or other information received. All updates provided to the school and parents/agent must be recorded in the incident record.
4. Aspire Guardians staff will constantly review the circumstances in the light of any enquiries made or information received, and inform the police of any developments by telephoning 101, quoting the reference number and providing the new information received. If the period of absence continues for six hours, consideration should be given as to whether the child should still be regarded as absent, or whether they should now be considered as missing. Six hours should be regarded as the maximum period before reconsideration, and in many cases a shorter period would be more appropriate.
5. Any case of an absent child or young person which causes significant concern, or gives rise to the suspicion of harm, should be brought to the attention of the Designated Safeguarding Lead without delay and should be reviewed with a view to the possibility that this is a missing child or young person.

Informing the Media

The Police are responsible for advising the media regarding children or young people who are reported as missing. The decision to publicise these matters will always be made in consultation with the parents who have to give their signed consent before the media are able to circulate the details. As such, no member of Aspire Guardians should release any details to the media and must refer any contact from them directly to the relevant force's Media Relations Office.

The Return

1. The police are responsible for ensuring that the child or young person reported missing has returned safe and well, and has an opportunity to disclose any relevant issues in the return interview.
2. Where a child or young person has been reported as absent to the police they will not be given a return interview. In such cases, an Aspire Guardians member of staff will conduct the return interview to allow the child or young person an opportunity to talk to someone about their absence.
3. Where an allegation of any form of child abuse is made or becomes evident, child protection procedures must be implemented and immediate contact must be made with the police child protection team and the Local Authority Child Protection Service where the child is living.
4. If there is any suggestion that the child has been a victim or perpetrator of crime, consideration must be given to securing evidence by police including by forensic examination. This should also include securing clothing and delaying washing/bathing in relevant cases. Staff must remember that all necessary permissions must be obtained from the child or young person's parents and/or those with parental responsibility. The priority is to recognise that the welfare of the child or young person is paramount and

careful consideration must be given to the potential effects of such procedures of the child or young person.

5. Any persons informed of the child or young person's absence should be advised of the child or young person's return without delay including the school and parent/agent.
6. For a child or young person who has been reported as absent or missing on two or more occasions, Aspire Guardians will decide in consultation with others, whether a formal review of the guardianship is required.

Children Missing Education

As explained in Keeping Children Safe in Education, all staff and homestays should be aware that children going missing from education, particularly repeatedly, can 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 can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse 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.' Should Aspire Guardians become aware that a student in their care is missing from education, they will notify the school or college that the student attends immediately.

Children Missing Education (2016) is statutory guidance that sets out key principles to enable local authorities in England to implement their legal duty under section 436A of the Education Act 1996 to make arrangements to identify, as far as it is possible to do so, children missing education (CME).

Children Missing Education explains that:

'All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Local authorities should focus their resources effectively in intervening early in the lives of vulnerable children to help prevent poor outcomes.'

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 31 March 2024

Appendix 6

Complaints Policy

Policy Statement

Aspire Guardians recognises that there may be legitimate concerns or complaints from students, staff, schools, parents or homestays relating to Aspire Guardians. As a company we encourage these concerns or complaints being made known to Aspire Guardians staff so that they can be addressed in partnership with us, and we can continuously improve our service.

At Aspire Guardians we:

- Take all concerns and complaints seriously;
- Make every effort to deal with concerns or complaints informally and at an early stage;
- Resolve all complaints within 28 working days of the complaint being received;
- Ensure that complaints are dealt with in line with the procedures set out in this document;
- Ensure that complaints are resolved either to the complainant's satisfaction or with an otherwise appropriate outcome;
- Ensure that, where appropriate, a full and fair investigation of the issue is undertaken;
- Ensure that no-one, including students, are penalised for making a complaint in good faith;
- Keep a written record, for at least three years, of all complaints, the action taken and at what stage they were resolved;
- Review regularly at senior management level the written record of complaints and their outcomes;
- Keep confidential all records relating to individual complaints;
- A record of formal complaints and their outcomes is kept by the CEO in electronic copy regardless of whether they were upheld.

Complaints Procedure

Stage 1: Informal Stage

It is hoped that most concerns or complaints can be resolved informally. A concern or complaint can be made in person, in writing or by telephone. They may also be made by a third party acting on behalf of a complainant, as long as they have appropriate consent to do so.

Concerns should be raised with the relevant Aspire Guardians staff member who will:

- Keep a record of the complaint and any action taken;
- Respond to all complaints or concerns within 24 hours;
- Investigate the concern or complaint;
- Report back to the complainant within five working days.

If the issue remains unresolved, the next step is to make a formal complaint.

Stage 2: Formal Stage

If the complainant is not satisfied with how the complaint has been handled, they can make a formal complaint. This should be sent in writing to the CEO or if it is about the CEO to Aspire's COO.

They will:

- Keep a record of the complaint and any action taken;
- Respond initially to the complainant within 24 hours;
- Investigate the concern or complaint – this may take some time but in any event they will keep the complainant informed of progress made;
- Report back to the complainant formally in writing no later than 28 working days;
- If the issue remains unresolved, the next step is to refer the matter to AEGIS.

Stage 3: Referral of the matter to AEGIS

If complainants are not satisfied with the outcome as decided by Aspire Guardians at stage 2, they can contact AEGIS to report their concerns if they wish to do so. Relevant contact details are set out below:

Yasemin Wigglesworth

Executive Officer Association for the Education and Guardianship of International Students (AEGIS)

The Wheelhouse, Bond's Mill Estate, Bristol Road, Stonehouse, Gloucestershire, GL10 3RF
+44 (0) 1453 821293

www.aegisuk.net

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 31 March 2024

Signed: CEO

Appendix 7

Anti-Radicalisation Policy

Policy Statement

Aspire Guardians (Aspire) recognise the importance of making all individuals aware of the Prevent Strand of the national Contest strategy, the policy and procedure to follow if they identify any concerns in relation to radicalisation and extremism, and how we can work with partners to protect children from this form of child abuse.

Legislation

Contest is the name of the UK's strategy to respond to the threat of domestic and international extremism, and the steps that need to be taken to protect the public. The strategy aims to reduce the risk to the UK and our assets overseas, so that people can go about their lives freely and with confidence. Contest is split into four strands:

- PREVENT – to stop people becoming terrorists or supporting terrorism
- PROTECT – to strengthen our protection against terrorist attack
- PURSUE - to stop terrorist attacks
- PREPARE- when an attack cannot be stopped to mitigate its impact

Since July 2015 schools and colleges have been subject to section 26 of the Counter-Terrorism and Security Act 2015, which states that in the exercise of their functions they are to have “due regard to the need to prevent people from being drawn into terrorism” i.e. the unofficial or unauthorised use of violence and intimidation in the pursuit of political aims.

This duty is known as the Prevent Duty and applies to a wide range of public-facing bodies.

The Prevent strategy was revised in 2011 and has the three following objectives:

1. Challenging terrorist ideology by working closely with other local and national agencies and partners, including our communities;
2. Supporting vulnerable individuals through intervention projects;
3. Work closely with institutions where risks may occur such as education, prisons and health.

This duty is passed onto schools in the statutory guidance Keeping Children Safe in Education which states that protecting children from the risk of radicalisation (i.e. the process where someone is led to adopt extreme political, social and religious ideals and aspirations), should be seen as part of schools' and colleges' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse:

“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. Radicalisation refers to the process by which a person comes to support terrorism and

extremist ideologies associated with terrorist groups. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised."

Aspire staff, volunteers and homestays should be alert to reports of changes in children's behaviour which could indicate that they may need help or protection. Staff, volunteers and homestays are encouraged to use their judgement in identifying children who may be at risk of radicalisation and to report any concerns to the Designated Safeguarding Lead (DSL), Suki Thomas. This may result in the DSL making a referral to the Channel programme (see below). The guardianship organisation's DSL (and any deputies) should be aware of local procedures for making a Prevent referral.

Channel/ Prevent Multi-Agency Panel (PMAP)

Channel/PMAP is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Channel refers to panels operating in England and Wales, while PMAP operates in Scotland.

The programme uses a multi-agency approach to protect vulnerable people by:

identifying individuals at risk

assessing the nature and extent of that risk

Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages.

Guidance on Channel is available at:

<https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance>

Policy

Staff members, volunteers and homestays are expected to have a general understanding of the risks affecting children and young people, how to identify individual children who may be at risk of radicalisation and what to do to support them. This policy outlines a clear procedure for protecting children at risk of radicalisation.

Aspire understands that the Prevent duty builds on existing partnerships for example with schools, parents and Local Safeguarding Partnerships. This policy considers the need for effective engagement with partners who are in key positions to spot signs of radicalisation (where this would not expose the child to further risk) and the need to be able to offer assistance and advice to those who raise concerns, and who require signposting to the right support mechanism. Aspire has a DSL who is responsible for dealing with any concerns in relation to radicalisation:

Designated Safeguarding Lead Contact Details

Role	Name	Telephone Number/s	Email
Designated Safeguarding Lead	Suki Thomas	+44 7542 181 244	stomas@aspireguardians.com
24-hour emergency contact	(UK) (HK)	+44 7542 181 244 +852 5978 6168	info@aspireguardians.com

Aspire understands the importance of awareness training for staff, volunteers and homestays to identify children at risk of being drawn into terrorism and to challenge extremist ideas (i.e. extreme political or religious views). Staff, volunteer and homestay training needs are assessed internally with the DSL being the point of advice and support for staff, with regular safeguarding updates being circulated.

Aspire ensures that staff, volunteers and homestays have an awareness of the advice offered to schools by the Department for Education on the Prevent duty. The Government has launched the 'educate against hate' website which provides information, tools and resources needed to recognise and address extremism and radicalisation in children and young people.

Recognising risks and vulnerabilities of radicalisation

Children and young people can be drawn into violence or exposed to messages of extremist groups by many means, including family or friends' influences, direct contact with extremist groups of organisations, **and** through the internet.

The risk of radicalisation may be combined with other vulnerabilities including:

Identity Crisis – Distance from cultural/religious heritage and uncomfortable with their place in the society around them;

Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging;

Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;

Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life;
Criminality – Experiences of imprisonment; poor resettlement/reintegration; previous involvement with criminal groups.

Potential risk indicators include:

- Use of inappropriate language
- Possession of violent extremist literature or accessing extremist websites
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Articulating support for violent extremist causes or leaders
- Using extremist views to explain personal disadvantage
- Joining or seeking to join extremist organisations
- Seeking to recruit others to an extremist ideology.

Some children may be at risk due to living with or being in direct contact with known extremists.

Aspire will assess the specific risks of radicalisation for the students in our care and review this risk assessment at least annually.

Working with partners to protect children

Aspire recognises the opportunity that the company has to support partners including schools and medical professionals in helping to protect and support children and young people at risk of radicalisation. Disclosures and concerns can be reported to Aspire staff in relation to our own students, and also in relation to other children and young people who our students may be in contact with.

As radicalisation and extremism are forms of child abuse, Aspire is aware of the duty to report cases or concerns in line with the company's Safeguarding and Child Protection Policy. The DSL will make a report to the police or the anti-terrorist hotline on 0800 789 321 for potential terrorist or extremist activity. Non-urgent concerns will be reported by the DSL to the Prevent Single Point of Contact within the relevant police force.

Staff should be aware that anonymous reports of suspicious activity can be reported through Crimestoppers on 0800 555 111 or via police force websites. Anonymous reports of potential terrorist or extremist activity can also be made to the anti-terrorist hotline on 0800 789 321.

Awareness Training for Staff, Volunteers and Homestays

The Home Office has developed three e-learning modules on Prevent/ Anti radicalisation. These provide online training for staff, volunteers and homestays who can regularly self-brief on how to identify children and young people who are at risk of radicalisation and extremism.

They can be used to complement the safeguarding training provided by Aspire:

1. Prevent awareness course- offers an introduction to the Prevent duty.

2. Prevent referrals course- supports staff to make Prevent referrals that are robust, informed and with good intentions. This is primarily a course for DSLs, prevent professionals or equivalent roles who make prevent referrals.
3. Channel or Prevent Multi-Agency Panel (PMAP) course- aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.
4. Refresher awareness course- this is a course for anyone who has already completed the awareness course and would like a reminder of the key points. This can be undertaken annually.

All courses can be found at: [Prevent duty training: Learn how to support people vulnerable to radicalisation](#)

Our DSL has completed all of these modules as required.

Government website with advice offered to schools: <https://educateagainsthate.com/>

Procedure for Reporting Concerns

1. Aspire staff member receives a report about a child or young person displaying indicators of radicalisation from a student, member of staff at a school, parent, homestay or other source by face to face disclosure, email or telephone call, or staff member develops concerns that a child or young person is displaying possible indicators of radicalisation
2. Aspire staff member adheres to the Safeguarding and Child Protection Policy including contemporaneously recording the disclosure in the most appropriate format (using the Tell Explain Describe model if the information is being given by a student), or reporting their concerns in writing to the DSL, Suki Thomas (+447542181244 / sthomas@aspireguardians.com).
3. The record of the disclosure is reported verbally as soon as practicable to the DSL, Suki Thomas, +44 7542 181 244, sthomas@aspireguardians.com.
4. The staff member must submit a written record of the disclosure or concern to the DSL Suki Thomas, +44 7542 181 244, sthomas@aspireguardians.com.
5. The DSL will hold an emergency strategy meeting to discuss the incident, assess the alleged threat and risk to the child, implement an action plan and continue to review the situation until a resolution has been achieved. The meeting will be recorded with timed and dated entries within an Incident Record to record all actions and updates.
6. The incident will be referred to a statutory agency for further review where this is a necessary, relevant and proportionate course of action where a child or young person may be at risk of suffering significant harm or in need of support.

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 31 March 2024

Signed: Suki Thomas