POLICY · 2026–27

Safeguarding and Child Protection Policy

Policy Statement

WBS 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.

Key Safeguarding Contact Details

ROLE	NAME	TELEPHONE NUMBER	EMAIL
Designated Safeguarding Lead (DSL)	Iain Howell	07984 925526	iain@whichbritishschool.com
Deputy Designated Safeguarding Lead (DDSL)	Jennifer Britton (Co-founder and Director)	07540 868974	jennifer@whichbritishschool.com
WBS Guardians 24-Hour emergency contact(s)	Iain Howell (CEO and DSL)	07984 925526	guardians@whichbritishschool.com
LSP	Derby and Derbyshire Safeguarding Children Partnership 184 Kedleston Road, Derby, DE22 1GT	01332 641172 or 01332 642351	ddscp@derby.gov.uk
LADO	Derbyshire Local Authority Designated Officer (LADO)	01332 642376 or urgent 01332 641172	cpmduty@derby.gov.uk

ROLE	NAME	TELEPHONE NUMBER	EMAIL
LSP	Kingston and Richmond Safeguarding Children Partnership – Richmond upon Thames Single Point of Access (SPA), Achieving for Children	020 8547 5008 (Mon–Thu 8am–5.15pm, Fri 8am–5pm) Out of hours: 020 8770 5000	Online referral: afc-self.achieveservice.com/service/SPA_Online_Referral
LADO	LADO service for Richmond upon Thames (provided by Achieving for Children)	020 8891 7370	Online LADO referral form via Achieving for Children

Iain Howell is the 24-hour emergency contact. When he is on leave or otherwise unavailable, the DDSL, Jennifer Britton, provides cover, and staff, homestays, parents and schools are told in advance.

Child Protection Principles

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

- WBS 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 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 WBS 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.

WBS 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 WBS 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.

Our approach is child-centred. Where there is a safeguarding concern, WBS Guardians will ensure that every decision and action is taken in the best interests of the child. The child will be listened to, and their wishes and feelings will be taken into account when deciding what action to take and what services to provide.

WBS Guardians adopts a coordinated, multi-agency approach to safeguarding. We play our part in local multi-agency safeguarding arrangements by working with the safeguarding partners (the local authority, the integrated care board and the police), with each student's school and with other agencies; by sharing information promptly; by contributing to assessments, strategy discussions and child protection plans when asked to; and by following the locally agreed inter-agency procedures for the area where the child is living or staying.

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, WBS Guardians undertakes the following:

1. Our CEO, Iain Howell, is also our DSL and has the appropriate safeguarding knowledge and involvement in the procedures we have in place, including 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 WBS 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 WBS 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 or DDSL 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 (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
- Data Protection Policy
- Privacy Notice
- Student Behaviour Code of Conduct
- Welfare, Health and Safety Statement
- Online Safety Risk Assessment
- Student Handbook, Parent Handbook and Homestay Handbook
- Mental health: our procedure for supporting students with mental health issues, including removal of a student from school, is set out in the Mental Health section of this policy (there is no separate mental health policy).

Government guidance

- Keeping children safe in education 2026 (publishing.service.gov.uk)
- Working together to safeguard children 2026

Definitions

TERM	WHAT THIS MEANS
Safeguarding and promoting the welfare of children	is defined as: 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 integrated care board (ICB) for the area 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.

Abuse, neglect and exploitation

(Taken from Keeping Children Safe in Education 2026)

- All staff, volunteers and homestays should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff, volunteers and homestays are able to identify cases of children who may be in need of help or protection.
- All staff, volunteers and homestays should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.
- All staff, volunteers and homestays, but especially the designated safeguarding lead (and deputies) 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, volunteers 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.

If staff, volunteers or homestays are unsure, they should always speak to the DSL or deputy.

- All staff, volunteers and homestays should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination, and that this is a safeguarding matter. WBS Guardians promotes an inclusive, anti-discriminatory culture where racism and other discriminatory behaviour are recognised, challenged and addressed. Such concerns should be reported to the DSL or DDSL in the same way as any other safeguarding concern.
- Staff, volunteers and homestays should also be aware that images of children can be digitally altered or wholly generated using artificial intelligence (AI), including what are sometimes described as 'deepfakes' or 'deep nudes'. Creating or sharing such images of a child is treated in the same way as sharing real nude or semi-nude images and must be reported to the DSL or DDSL.

Types of Abuse, neglect and exploitation

(Taken from Keeping Children Safe in Education 2026)

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, including where they see, hear or experience its effects. 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, causing or inciting 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. A child under the age of 13 cannot legally consent to any sexual activity. 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 WBS Guardians' procedures for dealing with it, as set out in this policy.

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, neglect and exploitation

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 DDSL) 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 (or, in their absence, the DDSL).
- Where there is a risk of immediate harm, call the Police on 999. The concern will also be referred immediately by telephone to children's social care for the area where the child is living or staying. For Richmond upon Thames this is the Single Point of Access (SPA) on 020 8547 5008 (out of hours 020 8770 5000).
- Less urgent concerns or requests for support, including early help (Family Help), will be referred by the DSL to children's social care for the area where the child is living or staying. For Richmond upon Thames this is via the SPA online referral form or 020 8547 5008; contact details for the other areas we operate in are listed in the tables in this policy.
- 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 so. 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 (or DDSL) 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 WBS 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).

WBS 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 that is discriminatory, including racist or faith-targeted abuse (online or offline);
- 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 making or sharing of nudes and semi-nudes (images and/or videos), including images that have been digitally altered or generated using AI;
- 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).

WBS 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 (and DDSL) 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 or DDSL 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/ DDSL. 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.
- WBS 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 WBS 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 and stored securely electronically with password protected files and be kept under review.

The DSL, Iain Howell will ensure they are engaging with their LSP.

How victims, perpetrators and any other children affected by child on child abuse will be supported

- WBS Guardians will support students who have been involved in child on child abuse.

This could include:

- Maintaining regular contact with the student/s to check on their welfare and provide an opportunity to talk.
- Providing homestays and staff information on a need-to-know basis so that they are able to offer support where appropriate.
- Working with the student's school to provide consistent support
- 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 (Family 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, WBS Guardians will consult with the police regarding how this case should be managed.

WBS 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.

WBS 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 WBS Guardians has:
- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- 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, WBS 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 (Iain Howell), or in their absence the DDSL (Jennifer Britton), who will act as "case manager". The case manager 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, it should be directed to the DDSL (Jennifer Britton). If the allegation is about the DDSL, it should be directed to the DSL (Iain Howell). If the allegation concerns both the DSL and the DDSL, or you do not feel able to report it internally, please contact the LADO directly using the contact details at the start of this policy.
- WBS 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: WBS 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 WBS 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 for or on behalf of WBS Guardians (including homestays) 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 (Iain Howell) or the DDSL (Jennifer Britton) 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.

WBS 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.

We encourage staff and homestays to self-report to our DSL (or DDSL) any situation which could appear compromising or be misconstrued, or where their behaviour has fallen below the standards required in the code of conduct.

WBS Guardians will also self-report to AEGIS any significant safeguarding concern, or any situation which could appear compromising or be misconstrued, or where behaviour has fallen below expected standards (AEGIS Quality Standard 6.5.3).

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 Iain Howell (or, in their absence, the DDSL Jennifer Britton on 07540 868974) 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 07984 925526

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.

WBS 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.

Keeping Children Safe in Education 2026 refers to a new statutory information-sharing duty, introduced by the Children's Wellbeing and Schools Act 2026, which is intended to give practitioners greater confidence to share information appropriately and in a timely way. WBS Guardians will follow this approach and share information promptly with safeguarding partners, schools and other agencies wherever it is relevant to safeguarding or promoting the welfare of a child.

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 2018 and the UK General Data Protection Regulation (UK GDPR) 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 and 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 DSL is Iain Howell (Co-founder and CEO). The DDSL is Jennifer Britton, Co-founder and Director. The DDSL is trained to the same standard as the DSL and the role is explicit in their job description. The DDSL acts for the DSL whenever the DSL is unavailable (for example during leave, sickness, travel or a conflict of interest) and is kept informed of open safeguarding cases so that cover is seamless.

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;
- keep the DDSL (Jennifer Britton) informed of all open cases and issues, so that cover is seamless when the DSL is unavailable.
- 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 DDSL 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 and DDSL

ROLE	NAME	TELEPHONE NUMBER	EMAIL
DSL	Iain Howell	07984 925526	iain@whichbritishschool.com
DDSL	Jennifer Britton (Co-founder and Director)	07540 868974	jennifer@whichbritishschool.com
24-Hour emergency contact	Iain Howell (CEO and DSL)	07984 925526	iain@whichbritishschool.com

Anti-Radicalisation and Prevent

Students may be susceptible to radicalisation into terrorism. Similar to protecting students from other forms of harms and abuse, protecting students from this risk is part of our safeguarding approach.

WBS Guardians has a separate policy that outlines our procedure for Anti-Radicalisation and Prevent. This can be found at www.whichbritishschool.com/policies

Prevent Lead Contact Details

ROLE	NAME	TELEPHONE NUMBER	EMAIL
Prevent Lead	Iain Howell	07984 925526	iain@whichbritishschool.com
Deputy Prevent Lead (DDSL)	Jennifer Britton (Co-founder and Director)	07540 868974	jennifer@whichbritishschool.com

Record keeping

WBS 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 and 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.

WBS 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

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

DSL and DDSL

The DSL and DDSL will attend suitable DSL-level safeguarding training, delivered face-to-face or as a live online course. This training will be renewed at least every two years, and their knowledge and skills will be refreshed at least annually.

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 have 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 WBS Guardians 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 or DDSL.

All staff will read Part One of Keeping Children Safe in Education 2026 in full and confirm in writing that they have done so (the condensed version for staff who do not work directly with children has been removed from the 2026 edition). Homestays will be given a summary of the key points relevant to their role as part of their annual training.

Whistleblowing

WBS 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)

WBS 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. WBS 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, WBS 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 WBS Guardians operates in the table below.

In the event of any contact information difficulties then WBS 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 the Guardianship Organisation is located

ROLE	NAME	TELEPHONE NUMBER	EMAIL
LSP	Derby and Derbyshire Safeguarding Children Partnership 184 Kedleston Road, Derby, DE22 1GT	01332 641172 or 01332 642351	ddscp@derby.gov.uk
LADO	Derbyshire Local Authority Designated Officer (LADO)	01332 642376 or urgent 01332 641172	cpmduty@derby.gov.uk
LSP	Kingston and Richmond Safeguarding Children Partnership – Richmond upon Thames Single Point of Access (SPA), Achieving for Children	020 8547 5008 (Mon–Thu 8am–5.15pm, Fri 8am–5pm) Out of hours: 020 8770 5000	Online referral: afc-self.achieveservice.com/service/SPA_Online_Referral
LADO	LADO service for Richmond upon Thames (provided by Achieving for Children)	020 8891 7370	Online LADO referral form via Achieving for Children

Contact Details for LSPs and LADOs across the areas that WBS Guardians operates

AREA	ROLE AND NAME OF CONTACT	TELEPHONE NUMBER	EMAIL
Surrey	LSP:	0300 470 9100	cspa@surreycc.gov.uk
Surrey	LADO:	0300 123 1650 (option 3)	LADO@surreycc.gov.uk
Shropshire	LSP: Ellie Jones	0345 678 9021 01743 249544 (Out of hours only)	N/A

AREA	ROLE AND NAME OF CONTACT	TELEPHONE NUMBER	EMAIL
Shropshire	LADO:	0345 678 9021	lado@shropshire.gov.uk
Rutland	LSP	01572 758 407 or Outside hours - 0116 305 0005	childrensreferrals@rutland.gov.uk
	LADO	01572 758 454	lado@rutland.gov.uk
Kent	LSP	03000 41 91 91	Frontdoor@kent.gov.uk
	Lado	03000 41 11 11	kentchildrenslado@kent.gov.uk Referrals online: **Kent Integrated Children's Services Portal**
Berkshire	LSP	01635 503090 or emergency 01344 351999	child@westberks.gov.uk edt@bracknell-forest.gov.uk
	LADO	0118 937 2684	LADO.LADO@westberks.gov.uk

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.
- WBS 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 the 'further information' annex of Keeping Children Safe in Education 2026 (publishing.service.gov.uk) for further details, including additional types of abuse.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately

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)

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 any type of schools (including special schools), 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 CCE and CSE 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 (from school or home) and are subsequently found in areas away from their home
- have been the victim, perpetrator or alleged 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 and The Children's Society County Lines Toolkit For Professionals.

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.

WBS Guardians will pay due consideration, and a full risk-assessment will be undertaken prior to taking guardianship of a student with mental health issues to ensure that the student's needs can be met.

Where students require medication for a mental health concern whilst with a homestay WBS Guardians will provide homestays with written instructions on a medication form. Homestays should record the dates and times any medication is given on the form provided. This form should be returned to the guardianship office after the student's stay.

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. The Office for Health Improvement and Disparities (formerly 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.

Mental health support contacts (AEGIS Appendix 10)

Staff and homestays can share these services with students, or contact them for advice:

- Childline (up to 19): 0800 1111, free and available 24 hours; childline.org.uk
- Samaritans: 116 123, free and available 24 hours; samaritans.org
- Shout crisis text line: text SHOUT to 85258, free and available 24 hours
- Young Minds (under 25): text YM to 85258; parents' helpline 0808 802 5544
- Mind: 0300 123 3393 (Monday to Friday, 9am to 6pm); mind.org.uk
- Beat eating disorders Youthline: 0808 801 0711
- FRANK (drugs and alcohol): 0300 123 6600, available 24 hours; text 82111
- For a medical emergency, call 999 or go to the nearest A&E department. For urgent medical advice, call NHS 111.

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 WBS Guardians is asked to remove a student with mental health issues from a school setting. WBS Guardians will work with the student's 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, WBS 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 WBS 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.

Children who may need additional support

Some students may need additional support or be more vulnerable, for example students with special educational needs or disabilities, health conditions (including mental health needs), young carers, students who are questioning their gender, students who have experienced trauma, and students whose first language is not English. WBS Guardians will gather this information from parents and schools at registration (with consent), record it on the student file, share it with homestays and staff on a need-to-know basis, and take it into account when planning care, communication and homestay placements. Any concern about such a student will be discussed with the DSL, who will liaise with the student's school and, where appropriate, other agencies.

Sexual violence and sexual harassment between children

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, or stays in the same homestay. 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 Keeping Children Safe in Education.

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.

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 set out in Part one of Keeping Children Safe in Education 2026 and in this policy. 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 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 student's school or college should they suspect a student is missing from education. The school or college will have a procedure for reporting this absence.

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 the 'further information' annex of Keeping Children Safe in Education 2026 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 the 'further information' annex of Keeping Children Safe in Education 2026 for further details.

This mandatory reporting duty applies to teachers and regulated professionals; it does not apply directly to WBS Guardians staff or homestays. Any staff member or homestay who suspects or is told that FGM has taken place, or that a student is at risk of FGM, must report it immediately to the DSL (or DDSL), who will report it to the police and children's social care.

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) Staff and homestays 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

The Domestic Abuse Act 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, 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.

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

Gender questioning children

Keeping Children Safe in Education 2026 includes guidance on supporting children who are questioning their gender. WBS Guardians will approach any such situation extremely carefully and through a safeguarding lens, working closely with the student's school and following the school's approach.

Parents should nearly always be involved in decisions about any request for social transition, except in the rare cases where involving them would put the child at significant risk of harm. Staff and homestays should not share information about a child's gender questioning unless there is a safeguarding reason to do so. Any concern should be discussed with the DSL or DDSL.

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 WBS Guardians feels our students or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

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

Staff and homestays should be aware of emerging risks linked to artificial intelligence, including AI-generated or digitally altered images ('deepfakes'), AI chatbots and image-manipulation apps, and should report any concerns to the DSL or DDSL.

WBS 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: 16/11/2026. Next review: September 2027, or sooner if statutory guidance changes.

Amended: 29/10/2026 (Richmond safeguarding contacts; child-centred and multi-agency statements; additional support section; removal form updated).

Signed:

Iain Howell, CEO and DSL

Jennifer Britton, Co-founder and Director and DDSL

Date: 28/09/2026

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:	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/ DDSL 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 WBS Guardians will not be able to collect the student until this form has been completed and returned to us by email: iain@whichbritishschool.com (or jennifer@whichbritishschool.com)

School Name	
Student Name	
Date of Birth	
Reason for request of removal of student	
Has the student been assessed by a medical professional? **Date of assessment if applicable.** **Please provide a summary of assessment if applicable.**	Yes ☐ No ☐
Is the student at risk of harm to themself?	Yes ☐ No ☐
Is the student a risk to others?	Yes ☐ No ☐

Has the school followed its mental health and child protection policies and procedures? Please provide a copy of any relevant policies and procedures.	Yes ☐ No ☐
Please provide full details of any medication (name, dose, frequency, and when last taken)	
Any other additional information we should be made aware of	
Signature	
Name	
Position	
Date	

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