

SAFEGUARDING AND CHILD PROTECTION POLICY

March 2024

Glamour Edu Ltd

Ying Lang Guardians

Glamour Edu Ltd

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1. Summary

This Safeguarding and Child Protection Policy is addressed to all Glamour Edu Ltd staff, host family members, students, partner schools. A digital copy of this Policy will be sent out to them through email. Hard copy can be provided if requested. It will be distributed to all new staff members on commencement of their employment and all Host Families on completion of their successful application with us. Safeguarding training for staff and host family members will be provided by Glamour Edu Ltd every three years. Annual update will be informed. Glamour Edu Ltd will work with partner schools and help students to cover relevant sections of the policy to ensure that they know how to keep safe and how to report any concerns they may have.

Any changes or updates of this Policy will also be sent to our staff, host families, parents, students, partner schools through email immediately. This Policy will be reviewed annually, and it is also available on our website at <http://www.glamouredu.com>.

This Safeguarding & Child Protection Policy should be read in conjunction with the following policies: Safer Recruitment Policy, Staff Code and Conduct Policy, Anti-Bullying including Cyberbullying and Online Safety Policy and Anti-Radicalisation Policy which will be send out sent to our staff, host families, parents, students, partner schools through email and also they can be downloaded from our website at <http://www.glamouredu.com>.

Policy owner: Glamour Edu Ltd Director

Date updated: March 2024, **Next review date:** Mar 2025

2. Company Organization key Contact:

| Role | Name | Contact |
|--|------------------------------------|---|
| Glamour Edu Ltd.'s Designated Safeguarding Lead & Prevent Lead (Director of Glamour Edu Ltd) | (Vicky) Xiaoyan Zhang | Telephone: 07825215210 (24/7) Email: v.zhang@glamouredu.com Address: 10 Kensington Grove, Altrincham, WA14 5AF, UK |
| Deputy Designated safeguarding Lead | Yonghui Song | Tele: 07827103839 Email: yinglang1@hotmail.com Address: 10 kensington Grove, Altrincham, WA14 5AF |
| Trafford Designated Officers (LADOs) | Anita Hopkins | Telephone: 0161 912 5125 Email: firstresponse@trafford.gov.uk |
| Trafford Safeguarding Child Board (LSCB/LSP) | Trafford Children's first response | Telephone: 0161 912 5125 emergency duty team 0161 9122020 Email: firstresponse@trafford.gov.uk |

| | | |
|---|--|---|
| Trafford Multi Agency Referral and Assessment Team - (MARAT) | Trafford Council Trafford Town Hall Talbot Road, Stretford, M32 0TH | Website: https://www.traffordsafeguardingpartnership.org.uk |
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Other useful contact:

Emergency number: 999

Non-emergency Police: 101

Health Service: 111

Child line: 0800 1111, Freepost 1111, London, N1 0BR. www.childline.org.uk

Social Services / Safeguarding Childrens' Boards: refer to the internet for details of the specific Local Authority. (For serious safeguarding concerns).

The police manage the MAPPA service, (Multi Agency Public Protection Arrangements), if someone is considered to be a significant threat to the community.

www.familylives.org.uk (Provides help and support to parents and carers).

NSPCC website. www.ncpcc.org.uk

www.getsafeonline.org/safeguarding-children

3. Introduction

The safety and the welfare of children "**Child Protection**" means protecting children from physical, emotional or sexual abuse and neglect. In addition, "**Safeguarding**" and promoting the welfare of children, is a broader term than child protection. It encompasses protecting children from maltreatment, preventing impairment of children's health or development, and ensures children grow up in safe circumstances.

The provision of a safe and caring environment for Glamour Edu Ltd students is paramount. Our students' welfare is our priority and therefore we promote a policy of trust and clear communication between all parties – Glamour Edu Ltd staff, students, Schools and host family members.

We are committed to safeguarding student's welfare and undertake rigorous checks on all who work with us. We expect all staff and volunteers to share this commitment. We have a clear Child Protection Policy & Safeguarding guided by HM Government **Working Together to Safeguard Children 2023, Keeping children safe in education 2023** and in line with the requirements of the Association of Education and Guardianship of International Students (AEGIS) and National Minimum Boarding Standards.

4. Our statement

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children has a role to play in safeguarding children. In order to fulfil this responsibility effectively, Glamour Edu Ltd requires all staff, students, schools and host family members to make sure their approach is always a child-centred one. This means that they should consider, at all times, what is in the best interests of the child.

No individual can have a full picture of a child's needs and circumstances. If children are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy should be used read in conjunction with the following documents which can all be found on the Gov.Uk website under the Safeguarding heading. Alternatively, these documents can be provided to you by us in hard copy if preferred and requested;

- **Working Together to Safeguard Children Dec 2023**
- **Keeping children safe in education 2023**
- What to do if you are worried if a child is being abused 2015

Every student should feel safe and protected from any form of abuse which, in this policy, means any kind of neglect, non-accidental physical injury, sexual exploitation or emotional ill-treatment. Glamour Edu is committed to safeguarding and promoting the welfare of children and young people and expects all staff and host families to share this commitment.

Glamour Edu Ltd will:

- treat all students with care and respect according to their needs and without discrimination of any kind;
- provide Glamour Edu Ltd staff members with child protection training, which will include clarification of their safeguarding responsibilities. Training will be reviewed and renewed every three years. This training will usually be offered by our Designated Safeguarding Lead- Xiaoyan Zhang.
- provide all host families with copies of this Safeguarding and Child Protection Policy
- be alert to signs of abuse within Glamour Edu Ltd the host family environment or within the school or college attended by the student;
- deal in a timely and appropriate manner with every suspicion or complaint of abuse;
- work closely with all agencies and bodies concerned with the protection and welfare of children and any school or college attended by the student to ensure that all allegations of abuse are dealt with justly and promptly;
- follow the local procedures for the Local Safeguarding partners in the area where the child is resident should this be necessary.
- ensure that, so far as possible, actions taken to protect a student, do not in themselves cause the student unnecessary distress. Such actions may include consultation with the police, which may result in criminal proceedings;

- ensure that it practices safer recruitment in checking the suitability of staff and host families to work with children and young people in accordance with the guidance given in the current edition of **Keeping children safe in education 2023**. Our DSL, Xiaoyan Zhang has attended and successfully completed the **SACPA Safer Recruitment course in 2023**. Safer Recruitment of Host Families training will be delivered to all Glamour Edu Ltd staff.

5. Responsibilities of Designated Safeguarding Lead

Glamour Edu Ltd's Designated Safeguarding Lead is Xiaoyan Zhang. She is the director of Glamour Edu Ltd. She is also the Prevent Lead for Glamour Edu Ltd. Xiaoyan Zhang had **Safer Recruitment Training on 24th Mar 2023** and **Designated Safeguarding Lead Training on 9th May 2023** through SACPA. She will renew her training every two years.

Xiaoyan Zhang's contact information is:

Mobile : 07825215210

Email : v.zhang@glamouredu.com

Address: 10 Kensington Grove, Altrincham, WA14 5AF, UK.

In the event that the DSL is not contactable or available, Please contact **DDSL, Yonghui Song**.

Yonghui Song's contact information is

Mobile: 07827103839

Email: yinglang1@hotmail.com

Address: 10 Kensington Grove, Altrincham, WA14 5AF

You also can contact your local safeguarding partners. In Trafford area, please contact Trafford Children's first response, Telephone: 0161 912 5225 Emergency Duty team 0161 9122020
Email: firstresponse@trafford.gov.uk Any activities undertaken by Glamour Edu Ltd which need to be aware, our DSL- Xiaoyan Zhang will liaise with Trafford LSP through email or telephone.

Parents are welcome to approach the DSL if they have any concerns about the welfare of any child in the care of Glamour Edu Ltd, whether these concerns relate to their own child or any other.

The main responsibilities of DSL- is:

- to advise and act upon all suspicion, belief and evidence of abuse reported to her
- support staff who make referrals to the LSP as in cases where the DSL is unavailable, staff must make direct contact where appropriate with the local Children's Services, as delay could put a child or Young Person at further risk of harm. Contact with the local Children's Services is made via the telephone numbers available on the Local Authority website.
- to be the first point of contact for Glamour Edu staff, host families, parents, students, and external agencies in all matters of child protection;
- act as a source of support, advice and expertise for staff.
- liaise with staff on safeguarding matters when deciding whether to make a referral by liaising with relevant agencies;
- to co-ordinate Safeguarding procedures within Glamour Edu Ltd;

- to maintain an ongoing training program for all Glamour Edu Ltd staff and our approved host families;
- to monitor the keeping, confidentiality and storage of records in relation to child protection;
- to liaise as necessary with the Designated Safeguarding Leads for child protection appointed by the Schools or colleges attended by students and relevant local agencies;
- to keep parents / guardians informed of action to be taken under these procedures in relation to their child in consultation with the school or college and relevant local agencies;
- where appropriate, to take part in child protection conferences or reviews
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- refer cases where a crime may have been committed to the Police as required.
- liaise with the head teacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the **Children Act 1989** and police investigations;
- refer cases to the Channel programme where there is a radicalisation concern as required; Channel 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. The programme uses a multi-agency approach to protect vulnerable people by, identifying individuals at risk, assessing the nature and extent of that risk and developing the most appropriate support plan for the individuals concerned. Channel may be appropriate for anyone who is vulnerable to being drawn into any form of terrorism. Channel is about ensuring that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist activity

6. Responsibilities of staff and host families

- Do everything reasonable within the definition of your job role to keep children safe
- be aware of Glamour Edu Ltd Safeguarding and Child Protection Policy and follow advice and procedures contained within this policy.
- Report any matters of concern to the Designated Safeguarding Lead as soon as is practically possible. Keep a comprehensive and concise record of any significant complaint, conversation or event and written reports and all correspondence should be handed to the DSL so that this paperwork can be stored appropriately.
- Report to the DSL as soon as possible even there is only low-level concerns about a child's wellbeing. Early help means providing support as soon as a problem emerges at any point in a child's life.
- each staff member must undertake appropriate safeguarding training, including refresher training regularly. Current AEGIS minimum guidelines suggest this is refreshed every three years.
- Any staff, homestays and volunteers must keep any safeguarding information shared with them confidential.

7. Staff-student and host family-student contact

Staff and host families will endeavour to keep physical contact with the student to a minimum and should consider the following guidelines: These guidelines are covered in the Staff Code of Conduct and Host Family Handbook which is given to all host families on completion of the successful application to Glamour Edu Ltd.

- the physical integrity of the students must be respected at all times. Staff and host family members may not engage in inappropriate physical contact of any kind;
- under no circumstances may a staff or host family member give tobacco or drugs to students. Alcohol may only be given, in moderation, at times specified by and with permission from parents or guardians and in accordance with the law restricting the sale, supply and consumption of alcohol;
- staff and host family members will prudently avoid situations in which they are alone with students in rooms or areas which are locked or made inaccessible to others;
- student's bedroom must always be regarded as private space, staff or host family members may never visit a student in his or her bedroom or dormitory except when exercising specific responsibilities or duty of care. In this case, doors should be left or another host family member made aware of the course of action being followed;
- staff involved in transporting students will exercise prudence if transporting students individually and where possible, it is sensible to ask the student to travel in the back seat of the car.

8 Early Help and inter-agency work

We should be aware of the early help process and understand their role in it. This includes:

- identifying emerging problems and potential unmet needs;
- liaising with the DSL;
- sharing information with other professionals to support early identification and assessment; and
- in some cases, acting as the lead professional in undertaking an assessment of the need for early help.

We should be alerting to identifying children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. If a member of staff has a concern, even a low-level concern that a child may need early help then s/he should, in the first instance, discuss early help requirements with the DSL, in the absence of DSL please contact with the local Children's Services or MAPPA. The telephone numbers available on the Local Authority website.

In Trafford, please use the link below: <https://www.trafford.gov.uk/residents/children-and-families/worried-about-a-child/trafford-first-response.aspx>

MAPPA which acts as the “front door” for child protection enquiries, anyone can contact MARAT, including parents, carers, young people, professionals, family members. Once a referral has been accepted an initial assessment will be completed with a view to identifying appropriate services.

Depending on the nature of your enquiry or request MARAT will also:

- Give advice and guidance.
- Provide information on available services.
- Put you in contact with other agencies or services which may be of help.
- Put you in contact with the relevant professional dealing with a family.

Where a child and family would benefit from coordinated support from more than one agency (e.g. education, health, Police) there should be an inter-agency early help assessment - such as the Common Assessment Framework. This should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under **the Children Act (1989)**. If early help is appropriate, where they are not taking the lead, then the DSL should support the member of staff in liaising with other agencies and setting up an inter-agency early help assessment as appropriate.

The early help assessment should be undertaken by a lead professional who should provide support to the child and family, act as an advocate on their behalf and coordinate the delivery of support services. The lead professional role could be undertaken by the DSL or Glamour Edu Ltd staff, a host family member, a teacher or a GP, family support worker, health visitor and/or special educational needs coordinator. Decisions as to who performs this role should be taken on a case-by-case basis and should be informed by the child and their family.

For an early help assessment to be effective:

- it should be undertaken with the agreement of the child and their parents or carers, and should involve the child and their family as well as all of the professionals who are working with them
- Staff or homestay (or other relevant professional) should be able to discuss concerns they may have about a child and family with a social worker in the local authority. Children’s social care in each local authority should set out the process for how this will happen
- if parents and/or the child do not consent to an early help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral to children’s social care may be necessary.

Effective early help in Glamour Edu Ltd setting involves the Glamour Edu Ltd. (under the guidance of the DSL) providing high quality support, in cooperation with or coordinating other agencies as appropriate. This will help address the assessed needs of the child and their family early in order to prevent the needs escalating and significantly improve the outcomes for the child. It is hoped that in each case this should improve the welfare of the relevant child. However, each case should be kept under constant review, and consideration should be given to a referral to the Local Authority Children’s Social Care if the child’s situation does not appear to be improving.

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves

9 Child in need

Child who has suffered or likely to be at risk of significant harm, or a child in immediate danger If at any time it is considered that the child may be a Child in Need (section 17, **Children Act 1989;2004**) a referral should be made to children's Social Care in the Local Authority in which the child has main residence, and in accordance with the threshold document published by the relevant LSP.

If there is evidence that the child has or is likely to be at risk of significant harm (section 47, **children Act 1989; 2004**), an urgent referral (telephone initially, then followed up with documentation) should be made to children's Social Care in the Local Authority where the child has main residence and in accordance with the threshold document published by the relevant LSP. The concerns held by Glamour Edu Ltd will be shared with the parents/guardian of the child unless to do so will heighten any risk of further harm to the child. Glamour Edu Ltd on these occasions will request and adhere to the advice given by Social Care and/or the Police and record this.

In situations where it is thought that the child is in immediate danger, the Police should be notified immediately by telephone using 999, followed by the school contacting Social Care. The concerns held by the school will be shared with the parents/guardian of the child unless to do so will heighten any risk of further harm to the child. The school on these occasions will request and adhere to the advice given by Social Care and/or the Police and record this.

10 A child's wishes

A child's wishes and feelings should be taken into account when determining what action to take and what services to provide. Systems are in place for children to express their views and give feedback to school and Glamour Edu staff. These operate with the best interests of the child at their heart.

Where possible, referrals will be made by the DSL, although any member of staff can make a referral to Children's Social Care. If a member of staff makes a referral themselves, they should inform the DSL as soon as possible. If someone has a concern about Female Genital Mutilation having been carried out on a girl under the age of 18; they have a legal duty to notify the Police immediately and

directly. Staff should consider and discuss the case with the DSL immediately and involve Children's Social Care as appropriate.

11 Abuse

"Abuse" includes any form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Abuse can include:

- physical abuse, for example beating or punching;
- emotional abuse, for example rejection and denial of affection;
- sexual abuse, for example sexual assault or encouraging a child to view pornographic material; and
- neglect, for example failure to provide appropriate care including warmth or medical attention.

11.1 Signs of abuse

Government advice What to do if you're worried a child is being abused gives the following examples as potential indicators of abuse or neglect:

- Children whose behaviour changes – they may become aggressive, challenging, disruptive, withdrawn or clingy, or they might have difficulty sleeping or start wetting the bed;
- Children with clothes which are ill-fitting and/or dirty and/or with consistently poor hygiene;
- Children who make strong efforts to avoid specific family members or friends, without an obvious reason;
- Children who don't want to change clothes in front of others or participate in physical activities;
- Children who are having problems at school, for example, a sudden lack of concentration and learning or they appear to be tired and hungry;
- Children who talk about being left home alone, with inappropriate carers or with strangers;
- Children who reach developmental milestones, such as learning to speak or walk, late, with no medical reason;
- Children who are regularly missing from school or education;
- Children who are reluctant to go home after school;
- Children with poor school attendance and punctuality, or who are consistently late being picked up;
- Parents who are dismissive and non-responsive to practitioners' concerns;
- Parents who collect their children from school when drunk, or under the influence of drugs;
- Children who drink alcohol regularly from an early age;
- Children who are concerned for younger siblings without explaining why;

- Children who talk about running away and/or children who shy away from being touched or flinch at sudden movements

11.2 Types of abuse

11.2.1 **Physical abuse** is 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. N.B: Some situations where children stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

Physical Abuse Indicators may include the following (this is not designed to be used as a checklist)

- Patterns of bruising; inconsistent account of how bruising or injuries occurred
- Finger, hand or nail marks, black eyes
- Bite marks
- Round burn marks burn and scalds
- Lacerations, wealds
- Fractures
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

11.2.2 **Emotional abuse** is 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 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.

Emotional Abuse Indicators may include the following (this is not designed to be used as a checklist)

- Over-reaction to mistakes, continual self-deprecation
- Delayed physical, mental, emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
Running away
- Compulsive stealing
- Masturbation, Appetite disorders - anorexia nervosa, bulimia
- Soiling, smearing faeces, enuresis

11.2.3 **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Sexual Abuse Indicators may include the following (this is not designed to be used as a checklist)

- Sexually explicit play or behavior or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home • Inability to concentrate, tiredness
- Refusal to communicate.
- Thrush, Persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behavior, self-mutilation, substance abuse
- Aggressive behavior including sexual harassment or molestation
- Unusually compliant
- Regressive behavior, Enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises, scratches in genital area

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

Indicators of Neglect may include the following (this is not designed to be used as a checklist)

- Hunger, tiredness or listlessness
- Child dirty or unkempt
- Poorly or inappropriately clad for the weather
- Poor school attendance or often late for school with poor concentration
- Affection or attention seeking behaviour
- Untreated illnesses/injuries
- Pallid complexion
- Stealing or scavenging compulsively
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Neurotic behaviour

11.2.5 **Child sexual exploitation** is a form of sexual abuse where children are sexually exploited for money, power, sexual gratification or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Indicators of Child sexual exploitation may include the following (this is not designed to be used as a checklist)

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

11.2.6 **Child on child abuse** can manifest in many different ways, including but not limited to on-line bullying, sexting, banter, initiation rituals and inappropriate or harmful sexualised behaviours. In most instances, the conduct of children and young people towards each other will be covered by the school behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Glamour Edu Ltd recognise that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'.

The forms of Child on child abuse are outlined below:

Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.

Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.

Harmful Sexual Behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally ‘normative’ parameters and harmful to themselves and others.

Serious Youth Violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19 i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. ‘Youth violence’ is defined in the same way, but also includes assault with injury offences.

The term child-on-child abuse can refer to all these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences. There are also different gender issues that can be prevalent when dealing with child on child abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence). Research indicates that young people rarely disclose child on child abuse and that if they do, it is likely to be to their friends. Therefore, we will also educate children and young people that we work with about how to support their friends if they are concerned about them, that they should talk to a trusted adult or someone at their school and what services they can contact for further advice.

Any concerns, disclosures or allegations of child on child abuse in any form should be referred to the Designated Safeguarding Lead. Where a concern regarding child on child abuse has been disclosed to the DSL, advice and guidance will be sought from Children’s Social Care and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

11.2.7 **Sexting** is the sending of an indecent image and can be illegal. A person under 16 is committing an offence if they send an indecent image of themselves and someone passing this on is also distributing an indecent image of a child. Glamour Edu seeks to protect children from sexting and the significant impact it can have.

Advice for children and young people is available at:

- <https://www.childline.org.uk/info-advice>

Advice for adults involved in the safeguarding of Young People is available at:

- <http://www.nspcc.org.uk/keeping-children-safe/sex-relationships>

12 Procedure for reporting abuse or complaints of abuse

12.1 A staff or host family member suspecting or hearing a complaint of abuse

Staff or host family should report all allegations or complaints of abuse to the Designated Safeguarding Lead or, if the complaint involves the Designated Safeguarding Lead, please report the complaint to the Trafford LADO’s (Local Authority Designated Officer) – Anita Hopkins, telephone: 01619125125, email: firstresponse@trafford.gov.uk

Staff or host family members should:

- listen carefully to the student and keep an open mind. Staff or host family members should not take a decision as to whether or not the abuse has taken place;
- not ask leading questions, that is, a question which suggests its own answer;
- reassure the student but not give a guarantee of absolute confidentiality. The staff or host family member should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken (please note that the giving of information to others, who have an obligation to receive the information for the purpose of protecting a child, is not a breach of confidentiality);
- keep a sufficient written record of any conversation regarding the suspected abuse. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Safeguarding Lead as soon as possible;
- attempt to safeguard and preserve all available evidence, (for example, notes, mobile phones containing text messages, clothing, computers);
- as soon as reasonably practicable after making a verbal report to the Designated Safeguarding Lead, complete the Reporting Form which can be found on the end of this policy;
- if deemed necessary and with full support from the DSL immediately provide a safe environment for the student.

Once the Designated Safeguarding Lead has been informed of the allegations or complaints of abuse, the staff or host family member suspecting or hearing of the abuse should continue to pass on any further information that comes to light but should not carry out any further investigations into the incident as this may prejudice the investigations of external agencies.

Parents and others who suspect abuse by or hear a complaint of abuse involving a Glamour Edu Ltd student should also inform the Designated Safeguarding Lead straight away.

12.2 Allegations against Glamour Edu Ltd staff, host families or any other adult

Our procedures for dealing with allegations against Glamour Edu Ltd staff and host families aim to balance the need to protect students from abuse and the need to protect staff and host families from false and unfounded allegations. Where appropriate, these procedures follow the guidance in the current edition of the Department of Education guidance **Keeping Children Safe in Education 2023**.

12.2.1 Suspension of staff will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure the safety and welfare of the student or students concerned; and the need for a full and fair investigation.

12.2.2 If an allegation is made against a member of the student's host family, Glamour Edu Ltd will provide the student with alternative accommodation while a full investigation takes place. Detailed guidance is given to staff and host families to ensure that their behaviour and

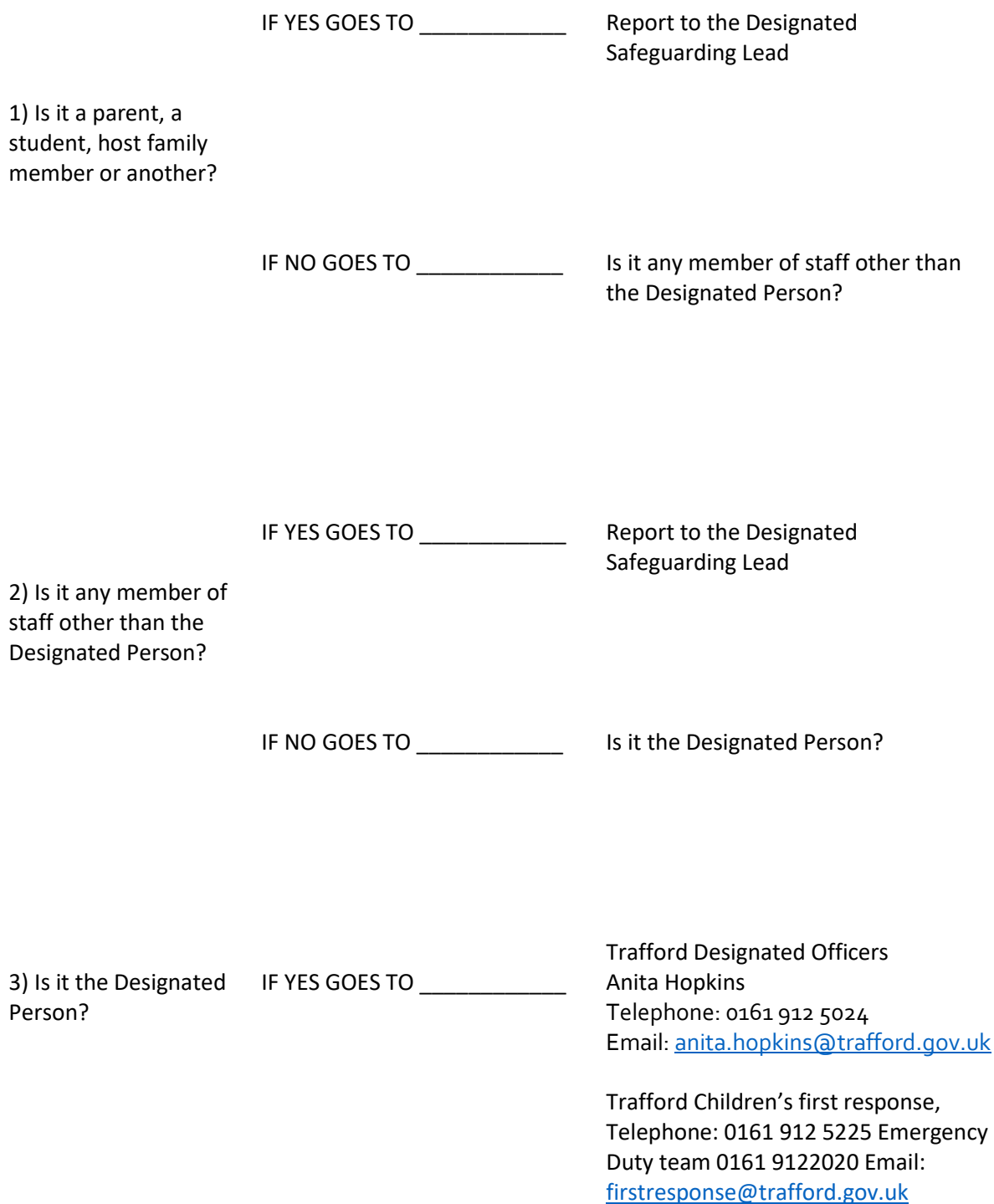
actions do not place students or themselves at risk of harm or allegations of harm to a student. This guidance is contained in Glamour Edu Ltd Host Family Handbook and in this policy under the section titled Staff-student and host family-student contact.

- 12.2.3 All staff are required to report to the Designated Safeguarding Lead any concern or allegations about Glamour Edu Ltd practices or the behaviour of colleagues or host family members which they feel are likely to put students at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report, provided that it is done in good faith.
- 12.2.4 If Glamour Edu Ltd ceases to use the services of a member of staff because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service (DBS) or other relevant body as determined by future legislation. This report will be made by the DSL. Any such incidents will be followed by a review of the safeguarding procedures within Glamour Edu Ltd and will be carried out by the DSL.
- 12.2.5 If a member of staff tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the Guardianship Organisation. Resignation will not prevent a prompt and detailed report being made to the DBS or other relevant body as determined by future legislation, in appropriate circumstances. This report will be made by the DSL.

12.3 Allegations against students

- 12.3.1 If a student for whom we have responsibility is accused of abuse against another student for whom we have responsibility, we will take all appropriate action to ensure the safety and welfare of both students, including the student accused of abuse.
- 12.3.2 If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, we will ensure that, in consultation with the student's school or college, parents or guardians are informed as soon as possible and that the student is supported during the interview by an appropriate adult.
- 12.3.3 If the school or college decide that it is necessary to suspend the student during the investigation, we will provide appropriate support, assistance and accommodation wherever possible.
- 12.3.4 These procedures will also apply as appropriate if a student for whom we have responsibility is accused of abuse against any other student for whom we do not have responsibility.

12.4 Allegations Flowchart



13 Whistleblowing Policy

Glamour Edu Ltd is committed to the highest standards of openness and accountability. Under certain circumstances, employees are protected from suffering any detriment or termination of employment if they make disclosures about organisations for whom they work.

Qualifying Disclosures

1. Certain disclosures are prescribed by law as “qualifying disclosures”. A “qualifying disclosure” means a disclosure of information that the employee genuinely and reasonably believes is in the public interest and shows that the Company has committed a “relevant failure” by:
 - Committing a criminal offence
 - Failing to comply with a legal obligation
 - A miscarriage of justice
 - Endangering the health and safety of an individual
 - Environmental damage
 - Concealing any information relating to the above
2. These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns that you may raise relating to the above matters very seriously.
3. The Employment Rights Act 1996 provides protection for workers who ‘blow the whistle’ where they reasonably believe that some form of illegality, injustice or breach of health and safety has occurred or is likely to occur. The disclosure has to be “in the public interest”. We encourage you to use the procedure to raise any such concerns.

The Procedure

1. In the first instance you should report any concerns you may have to Vicky Xiaoyan Zhang; Tel: 07825215210; Email: v.zhang@glamouredu.com. She will treat the matter with complete confidence. If you are not satisfied with the explanation or reason given to you, you should raise the matter with the appropriate official organization or regulatory body.
2. If you do not report your concerns to Vicky Xiaoyan Zhang, you should take them direct to the appropriate organization or body.
3. The NSPCC have a whistleblowing helpline which is available for staff and host families who do not feel able to raise concerns regarding child protection failures within Glamour Edu Ltd. You can call 0800 800 5000 between 10am and 8pm Monday to Friday or can email: help@nspcc.org.uk

Treatment by Others

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to disciplinary action.

Timescales

We will ensure that investigations are undertaken as soon as practically possible. Depending on the nature of concern and the need to involve external parties i.e. the police, there may be a delay in the final outcome of the investigation. Where there is likely to be a delay, we will ensure you are kept up to date where possible.

14 Absent or Missing Student Policy

This policy is designed to be implemented in cases where students (under the age of 18) are believed to be absent or missing from the care of Glamour Edu Ltd. The purpose of the policy is to help locate the student by the fastest and safest means possible and return them to an approved location. Glamour Edu Ltd is wholly committed to safeguarding and promoting the welfare of all students under their Guardianship.

What could happen with Absent or Missing Students

When a child is absent or missing, they may be at risk from all forms of serious harm including abuse, exploitation, radicalisation and trafficking. Children are recruited, moved or transported and then exploited, forced to work or sold. Children are trafficked for child sexual exploitation, benefit fraud, forced marriage, domestic servitude (cleaning, childcare, cooking), forced labour in factories or agriculture, and criminal activity. Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another. Glamour Edu Ltd Safeguarding & Child Protection Policy is to protect children and young people from these risks.

Definitions:

The following definitions have been agreed with Children's Services and included within the Local Safeguarding Children Board 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.

How to Prevent and Report Missing Students

Students are provided with a 24/7 telephone number to access the Designated Safeguarding Lead- (Vicky) Xiaoyan Zhang to assist them at all times. They are made aware of how to access advice and support from NSPCC, ChildLine and Police are available.

The policy and procedure for responding to any safeguarding concern are the same as laid out in the Glamour Edu Ltd Safeguarding and Child Protection Policy document and the same reporting procedure is used.

Most importantly all safeguarding concerns should be raised with the Glamour Edu Ltd Designated Safeguarding Lead Vicky Xiaoyan Zhang via landline on 01617678858 or mobile on 07825215210 as quickly as possible and if there is concern that a child may be at immediate and severe risk the Police should be contacted – the child must come first.

Staff must submit their concerns in writing and ensure that they receive formal acknowledgement from the Glamour Edu Ltd that this concern has been received and action is being undertaken.

In the event of a missing child, schools have the lead on any incidents which happen during the term time. Glamour Edu Ltd respond to incidents during exeat weekends, half terms or during a period of expulsion/suspension where the student is with a Glamour Edu Ltd Host Family or travelling to and from either the host or airport unarranged by the school.

Students being reported as absent or missing to Glamour Edu Ltd from Schools, Host families or travel providers are initially regarded as children in need. The Designated Safeguarding Lead is notified and takes responsibility for the response of Glamour Edu Ltd. All reasonable, safe and speedy means are used to locate the student and may mean referral to the Police.

If you have concerns or are worried that a child in your care has gone missing, you should consider the following:

- That child is at immediate risk of coming to harm – call 999 and engage the Police.
- That child may be at risk of coming to harm – call 111 and discuss with local Police.
- The child is not at immediate risk of harm but you are concerned – call Glamour Edu Ltd emergency contact number 07825215210.

At all times you should contact Glamour Edu Ltd emergency number and inform us of your concerns / issue.

If any child is persistently late then you should contact Glamour Edu Ltd and discuss the issue with our Designated Safeguarding Lead- Vicky Xiaoyan Zhang either via landline on 01617678858 or mobile on 07825215210

The Glamour Edu Ltd Guardianship Student Record is assessed for the incident to be effectively managed, so the safety of the student can be maximized. Any report pertaining to Child Protection will be automatically classified it as a RED incident.

All incidents are investigated through discussions with the school, parents, existing records and other agencies as appropriate.

Parental consent for referral will be sought unless the child may be at risk of significant harm or there may be the risk of a loss of evidential material. All verbal conversations should be recorded in writing, with details such as date, time, location, names of those present and so on attached. It may be appropriate to note the physical and or emotional demeanor of the child. It is the role of the Designated Safeguarding Lead to investigate; all others involved should describe and explain relevant information, but it is not her role to investigate. Where conversations with the child are held and recorded it must be made clear to the child that information will be passed on.

The information is evaluated on the day of receipt and a decision made and recorded regarding the next course of action and/or outcome. This could include no further action or future actions, or emergency action to protect a child through the statutory

Authorities (e.g. Police or Social Services) where there is a risk to the life of a child or the possibility of serious immediate harm.

Should the investigation so indicate, the student could be a child 'in need' and a referral would be made to social services. Glamour Edu Ltd Designated Safeguarding Lead must review and approve the outcomes of the incident and ensure the record has been updated.

15 Child incident reporting form

Introduction

This form comprises part of the Glamour Edu Ltd Safeguarding and Child Protection Policy and should be read in conjunction with the whole Safeguarding and Child Protection Policy.

This form is designed to be completed by any member of staff or host family member who receives information raising child protection concerns either through observation or direct disclosure, from a student or from another source. The purpose of this form is to ensure that an adequate amount of information is recorded at the outset. This form must be completed as soon as possible after the information is received. Do not allow the completion of the form to delay any verbal notification of the concerns to the Designated Safeguarding Lead but pass the completed form to the Designated Safeguarding Lead if the Designated Safeguarding Lead is unavailable as a matter of urgency.

- The Guardianship Organisation's Designated Safeguarding Lead is Vicky Xiaoyan Zhang, **Telephone:**07825215210 **Email:** v.zhang@glamouredu.com **Address:** 10 Kensington Grove, Altrincham, WA14 5AF, UK

Data protection information notes

Glamour Edu Ltd holds personal information about students in order to safeguard and promote their welfare.

The content of this form, when completed, will contain personal information which is subject to the provisions of the General Data Protection Regulation (GDPR) which came into effect from **25 May 2018**. Students, and in certain circumstances their parents or guardians, have the right to request access to personal information about them held by Glamour Edu Ltd, including the content of this form, although exemptions may apply depending on the circumstances. Legal advice should be sought before any information of this nature is disclosed to students, parents or guardians. This advice will be sought by the DSL.

Glamour Edu Ltd will keep this record secure and **confidential by electronic and password protected storing**, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. For example, where, in the professional opinion of the Designated

Safeguarding Lead, it is deemed necessary we may share this information with the social services or the police for the purpose of child protection investigations.

To be completed by a member of staff or host family

Remember:

- ask "open" questions and not leading questions, that is, a question which suggests its own answer
- listen carefully and keep an open mind
- do not take a decision as to whether the alleged abuse or neglect has taken place.

Reporting form

| | |
|--|--|
| Your name: | |
| Your role:: | |
| Contact information (you): | |
| <i>Address:</i> | <i>Postcode:</i> |
| <i>Telephone numbers:</i> | <i>Email address:</i> |
| Child's name: | Child's date of birth: |
| Child's ethnic origin: <i>Please state</i> | Does child have a disability: <i>Please state</i> |
| | |
| | |
| Child's gender: | |
| <input type="checkbox"/> Male <input type="checkbox"/> Female | |
| Parent's / carer's name(s): | |
| Contact information (parents/carers): | |
| <i>Address:</i> | <i>Postcode:</i> |
| <i>Telephone numbers:</i> | <i>Email address:</i> |
| Have parent's / carer's been notify of this incident? | |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| If YES please provide details of what was said/action agreed: | |
| | |

Are you reporting your own concerns or responding to concerns raised by someone else:

- Responding to my own concerns
- Responding to concerns raised by someone else

If responding to concerns raised by someone else: *Please provide further information below*

Name:

Position within the sport or relationship to the child:

Telephone numbers:

Email address:

Date and times of incident:

Details of the incident or concerns:

Include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay.

Child's account of the incident:

Please provide any witness accounts of the incident:

Please provide details of any witnesses to the incident:

Name:

Position within the club or relationship to the child:

Date of birth (if child):

Address:

Postcode:

Telephone number:

Email address:

Please provide details of any person involved in this incident or alleged to have caused the incident / injury:

Name:

Position within the club or relationship to the child:

Date of birth (if child):

Address:

Postcode:

Telephone number:

Email address:

Please provide details of action taken to date:

Has the incident been reported to any external agencies?

Yes

No

If YES please provide further details:

Name of organisation / agency:

| | | | |
|---------------------------------------|--|--------------------|--|
| <i>Contact person:</i> | | | |
| <i>Telephone numbers:</i> | | | |
| <i>Email address:</i> | | | |
| <i>Agreed action or advice given:</i> | | | |
| Your Signature: | | Print name: | |
| Date: | | | |

16 Safeguarding and child Protection Training

Training for DSL:

Glamour Edu Ltd.'s Designated safeguarding lead - Vicky Xiaoyan Zhang had **Safer Recruitment Training on 24th Mar 2023 and Designated Safeguarding Lead Training on 9th May 2023** through SACPA. She will renew her training every two years.

Training for Staff and host family members:

Glamour Edu Ltd DSL will liaise with AEGIS & LSPs in determining the appropriate source of training and ensure all members of staff and homestays receive appropriate safeguarding training to an appropriate basic awareness (level 1). The training will be renewed every three years.

Training for students:

Glamour Edu Ltd DSL will also work with partner schools and help students to cover relevant sections of the policy to ensure that they know how to keep safe and how to report any concerns they may have.

Glamour Edu Ltd will keep the formal record of all safeguarding training. All homestays will receive regular safeguarding updates annually. Any changes and annual updates of this Policy will also be sent to our staff, host families, parents, students, partner schools through email immediately.

17, Glamour Edu Ltd other Policies

Glamour Edu Ltd also have other policies which will be given to all host families on completion of the successful application to Glamour Edu Ltd. They can also be downloaded from Glamour Edu Ltd website. This Safeguarding & Child Protection Policy should be read in conjunction with the following policies.

Students Behaviour Policy

At their first meeting with Glamour Edu Ltd, the student will be provided with a Student Handbook and student behaviour policy. Clear guidelines are given in this behaviour policy on conduct and behaviour whilst staying with a host family.

Complaints Policy

You should notify (Vicky) Xiaoyan Zhang in writing in the event that you wish to make a complaint about Glamour Edu Ltd.'s service. Glamour Edu Ltd will handle all complaints as swiftly and comprehensively as is reasonably possible. Any issues regarding the welfare of the guardianship student will be dealt with immediately.

Data Protection Policy

This policy outlines Glamour Edu Ltd.'s commitment to the protection and integrity of data held on individuals (staff, students, clients and other individuals) in compliance with the **Data Protection Act 2018** and with The General Data Protection Regulation (**GDPR**) **2018**. The Act defines UK law on the processing of data on living, identifiable people and is the main piece of legislation that governs the protection of personal data in the UK.

Staff Code of Conduct

We expect the highest standards of conduct from our employees and homestay families. Any breach of this policy may result in disciplinary action for employees or termination of engagement for host families and depending on the circumstances, contact with appropriate outside organisations i.e. the police, or the Disclosure and Barring Service

Safer Staff Recruitment Policy

Glamour Edu Ltd is committed to the welfare of the young people in our care. We recognise our legal requirements when recruiting and employing staff and host families to act in any role within the organisation.

Online Safety Policy

Host families play a crucial role in ensuring that the students who stay with them use the internet and mobile devices in accordance with the guidance contained within the Homestay Handbook. Glamour Edu Ltd encourages staff and host families to set an appropriate agreement with students in order to supervise internet access and set boundaries about what they can and cannot do online.

Welfare, Health and Safety Policy

To ensure home stay accommodation is safe and comfortable and make clear areas that are out of bounds.

Anti-radicalisation and Prevent Duty Policy

If you have a concern about a particular student, you should follow Glamour Edu Ltd.'s normal safeguarding procedures, including discussing with Glamour Edu Ltd Designated Safeguarding Lead-Vicky in the first instance. In Prevent priority areas, the local authority will have a Prevent lead who can also provide support. You can also contact your local police force or dial 101 (the non-emergency number). They can talk to you in confidence about your concerns and help you gain access to the correct support and advice.

Low Level Concern Policy

The safety and wellbeing of students in our care is dependent on the vigilance of all our staff and their prompt communication to the DSL or Managing Director 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.

Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated. We are a 'telling' organisation. If you are concerned about the behaviour or actions of any adult, speak to the DSL or Managing Director.