Explore Education
Privacy Notice

Policy Statement

Explore Education 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)	Phillip Lu	07767003286	phillip@exploreconsulting.co.uk
24-Hour emergency contact	Phillip Lu or Renee Zhou	07885391531	info@exploreconsulting.co.uk
LSP	Surrey Safeguarding Children's Partnership	0300 470 9100	cspa@surreycc.gov.uk
LADO	Surrey Safeguarding Children's Partnerships	0300 133 1650	LADO@surreycc.gov.uk

Child Protection Principles

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

- Explore Education 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;

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• 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 Explore Education 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.

Explore Education 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 Explore Education will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. 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.

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
- Peer on Peer 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, Explore Education undertakes the following:

1. We ensure that we lead from the top by ensuring that our director has the appropriate safeguarding knowledge and involvement in the procedures we have in place. This includes having oversight of arrangements.
2. Training is provided for all staff and homestays to a level appropriate for their role (see training section below);
3. We promote an environment of trust, openness and clear communication between students, school and Explore Education 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 Explore Education procedures as outlined below;
5. We ensure that all guardianship personnel, homestays and personnel offering outsourced services who come into direct contact with students in our care, are recruited using safer recruitment practices and are formally screened through the completion of an enhanced DBS check;
6. We maintain links with the appropriate agencies who have a statutory responsibility to deal with child welfare and child protection concerns.

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

Supporting procedures and documents

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

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

Government guidance

- Keeping children safe in education 2024 (publishing.service.gov.uk)

- Working together to safeguard children
- Sexual violence and sexual harassment between children in schools and colleges

Keeping Children Safe in Education

Part one of *Keeping Children Safe in Education* provides an overview for staff, homestays and volunteers who are working with children. This is written with schools and colleges in mind, but much of the information is relevant to guardianship organisations and homestays. Explore Education advises all staff, homestays and volunteers who come into contact with children to have read this document. This can be found here Keeping children safe in education 2024 (part one only) (publishing.service.gov.uk)
Annex A of *Keeping Children Safe in Education* is a condensed version of Part one of *Keeping Children Safe in Education*. Explore Education advises all staff who do not directly work with children to read this document instead of part one.
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.

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

What is abuse and neglect?

- Knowing what to look for is vital to the early identification of abuse and neglect. All staff and homestays should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff or homestays are unsure, they should always speak to the DSL.
- All staff and homestays should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.
- Contextual Safeguarding: All staff, volunteers and homestays should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the guardianship organisation, school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead 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 exploitation, criminal exploitation, and serious youth violence.

Types of abuse and neglect

(Taken from *Keeping Children Safe in Education* 2022)

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff and homestays should be aware of it and of their guardianship organisation's policy and procedures for dealing with it.

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

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

Signs of Abuse and Neglect

The following information has been taken from the NSPCC website https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse (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

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

Indicators of Emotional Abuse

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

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

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

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

Children might:

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

Indicators of Sexual Abuse

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

Emotional and Behavioural signs

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

Physical Signs

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

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

- spend a lot more or a lot less time than usual online, texting, gaming or using social media
- seem distant, upset or angry after using the internet or texting
- be secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet
- Children and young people might also drop hints and clues about the abuse

Indicators of Neglect

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

Poor appearance and hygiene

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

Health and development problems

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

Housing and family issues

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

Change in behaviour

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

Procedures

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

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

- All staff members and homestays have a duty to identify and respond to suspected / actual abuse or disclosures of abuse. Any member of staff, volunteer or homestays who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the DSL.
- Where there is risk of immediate harm, concerns will be referred immediately by telephone to the LSP or the Police.
- Less urgent concerns or requests for support, including for Early Help, will be sent by the DSL to the LSP.
- 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 re-consideration of the case with the designated safeguarding lead.
- Explore Education will also self-report to AEGIS any significant safeguarding concerns or situation which could appear compromising or be misconstrued, or where behaviour has fallen below expected standards.
- If, for any reason, the DSL is not available, or you do not feel that your concern is being taken seriously, this should not delay appropriate action being taken. Any individual may refer to the LSP or Police where there is suspected or actual risk of harm to a child. The contact details are included at the beginning of this policy.
- Full records of reports and action taken will be maintained by the DSL and securely stored in a specific safeguarding file.

How Explore Education will respond to Peer-on-Peer Abuse

All staff and homestays should be aware that children can abuse other children (often referred to as peer on peer 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 peer-on-peer 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 have **any** concerns regarding peer on peer abuse they should speak to their designated safeguarding lead.

Explore Education 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 peer-on-peer abuse is unacceptable and will be taken seriously.

Peer on peer abuse is most likely to include, but may not be limited to:

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

Explore Education has the following procedures that help to minimise the risk of peer-on-peer abuse:

- Regular training for staff and homestays
- Educating students through our handbooks and through discussion
- Providing students with clear guidelines within the student handbook on how to raise a concern.
- Fostering effective channels of communication so that students feel comfortable approaching their homestay carer or guardian with any concerns.
- Effective communication between the DSL with the DSL in schools where students are placed.

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

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How students can raise a concern

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

How allegations will be recorded, investigated and dealt with

- All reports of peer-on-peer abuse will be made on a case by case basis with the DSL taking a leading role using their professional judgement and supported by other agencies such as social care or the police as required.
- Explore Education 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 Explore Education 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 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 *electronic* and be kept under review. The DSL will ensure they are engaging with their LSP.

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

- Explore Education will support students who have been involved in peer-on-peer 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 peer-on-peer abuse.

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Management of the report

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

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

Explore Education expects all staff and homestays to be clear on the policy and procedures with regards to peer on peer 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. Explore Education 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 Explore Education 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, Explore Education 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 director of Explore Education who will act as "case manager". The director must contact the LADO immediately and follow their advice. They **must not** investigate themselves. If the allegation is about the director, please contact the LADO directly.
- Explore Education 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.

Allegations that do not meet the threshold

Low level concerns: Explore Education 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 Explore Education. It is

imperative that staff understand the importance of reporting any concerns that they may have. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a student, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.
The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

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

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

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.
The safety and wellbeing of students in our care is dependent on the vigilance of all our staff, volunteers and homestays and their prompt communication to the DSL 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. Explore Education 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.

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 Phillip Lu 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 0788539151.

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 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.

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

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

All staff and homestays must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff and homestays are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the DSL 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

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 designated safeguarding lead is expected to:

• refer cases of suspected abuse to the local authority children's social care as required;
• support staff and homestays who make referrals to local authority children's social care;
• refer cases to the Channel programme where there is a radicalisation concern as required (this may also be undertaken by the Prevent Lead, if the Prevent Lead is not the DSL);

• support staff and homestays who make referrals to the Channel programme (this may also be undertaken by the Prevent Lead, if the Prevent Lead is not the DSL);
• refer cases where a crime may have been committed to the Police as required.
• act as a point of contact with the three safeguarding partners;
• liaise with the Managing Director to inform them of issues
• liaise with staff and homestays on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
• act as a source of support, advice and expertise for all staff and homestays.
• understand the importance of information sharing, both within the guardianship organisation, and with the safeguarding partners, the DSL for the school the student attends, other agencies, organisations and practitioners
• encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, homestays and volunteers and in any measures the guardianship organisation may put in place to protect them; and,
• understand the difficulties that students may have in approaching staff and homestays about their circumstances and consider how to build trusted relationships which facilitate communication.
• ensure the guardianship organisation's child protection policies are known, understood and used appropriately;
• ensure the child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the *directors* regarding this;
• ensure the child protection policy is available for all relevant parties;
• link with the safeguarding partner arrangements to make sure staff and homestays are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Contact Details for the DSL

Role	Name	Telephone Number	Email
DSL	Phillip Lu	07767003286	phillip@exploreconsulting.co.uk
24-Hour emergency contact	Phillip Lu or Renee Zhou	07885391531	info@exploreconsulting.co.uk

Prevent

Explore Education has a separate policy that outlines our procedure for Anti-Radicalisation and Prevent. This can be found in the policy kit.

Prevent Lead Contact Details

Role	Name	Telephone Number	Email

Prevent Lead	Phillip Lu	07767003286	phillip@exploreconsulting.co.uk

Record keeping

Explore Education 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 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.
Explore Education 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.

Training and updates

Explore Education 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

The DSL will attend suitable face-to-face training as approved or provided by the Local Safeguarding Partners (LSP), AEGIS or the NSPCC. This training will be renewed every two years.

Other staff and homestays

All other members of staff, volunteers and Homestays will receive appropriate safeguarding training to an appropriate basic awareness level (previously referred to as level 1), every three years. This will either be done online or in person. Members of staff, volunteers and Homestays who have already 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 Explore Education own procedures for

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

Whistleblowing

Explore Education 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)

Explore Education 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. Explore Education 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, Explore Education 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 Explore Education operates in the table below.
In the event of any contact information difficulties then Explore Education 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	Surrey Safeguarding Children's Partnership	0300 470 9100	cspa@surreycc.gov.uk

LADO	Surrey Safeguarding Children's Partnership	0300 123 1650 option 3	LADO@surreycc.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.
- Explore Education 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* (2024). It has been edited so that where appropriate, references to schools and colleges has been replaced with reference to guardianship organisations. This is to make it more relevant to the reader. Please refer to annex B of Keeping children safe in education 2024 (publishing.service.gov.uk) for further details, including additional types of abuse.

Safeguarding issues

All staff 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 nude and semi-nude images and/or videos can be signs that children are at risk. Below are some safeguarding issues all staff should be aware of. Additional information on these safeguarding issues and information on other safeguarding issues is included in Annex B. Other safeguarding issues all staff 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 part 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.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories,

shoplifting, or pickpocketing. They can also be forced or manipulated into committing
vehicle crime or threatening/committing serious violence to others.
Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.
CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

Mental Health

All staff and homestays should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Guardianship staff and homestays, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff and homestays are aware of how these children's experiences, can impact on their mental health, behaviour, and education.
Guardianship organisations can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More

information can be found in the mental health and behaviour in schools guidance, guardianship organisations may also wish to follow this guidance as best practice.
Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. This may be of use to guardianship organisations. See Rise Above for links to all materials and lesson plans.
If staff or homestays have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead.

Sexual violence and sexual harassment between children in schools and colleges

Context

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.
It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
Staff and homestays should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.
Staff and homestays should be aware of the importance of:
• challenging inappropriate behaviours;
• making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
• not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
• challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is sexual violence and sexual harassment?

Sexual violence

It is important that guardianship organisation staff, homestays and any volunteers are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to

sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003135 as described below:

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

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

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

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

What is consent?

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

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16; 138
- sexual intercourse without consent is rape.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a

line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and

• online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

  o consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. As set out in UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
  o sharing of unwanted explicit content;
  o upskirting (is a criminal offence);
  o sexualised online bullying;
  o unwanted sexual comments and messages, including, on social media;
  o sexual exploitation; coercion and threats.

Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

The response to a report of sexual violence or sexual harassment

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

If staff or homestays have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 55 in Part one of *Keeping Children Safe in Education*. As is always the case, if staff or homestays are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

Serious violence

All staff and homestays should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also

indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).
All staff and homestays should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance. This is also useful advice for guardianship organisations.

Children missing from education

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

County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.
Children are also increasingly being targeted and recruited online using social media.
Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;

• are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
• are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
• owe a 'debt bond' to their exploiters;
• have their bank accounts used to facilitate drug dealing.
Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.
Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;
• unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
• denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
• making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.
Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.
If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.
Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

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

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

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

FGM

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

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

Forced marriage

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

The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, pages 32-36 of which focus on the role of schools and colleges. Staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

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Domestic Abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

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

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

Online safety

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

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

• **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

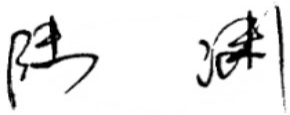
• **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes'.

• **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
• **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If Explore Education feels our students or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).
Explore Education recognises the risks posed to students online. Further information can be found in the online safety and bullying (including cyber-bullying) policies.
Explore Education 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: September 28, 2026

Signed: 

Date: September 28, 2026

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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:			

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For DSL use:

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

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