

# Hope International Education (UK) Ltd Safeguarding and Child Protection Policy

## Policy Statement

Hope International Education (UK) Ltd 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)	Mei XIAN	07305020013	m.xian@hope-studyabroad.com
Hope International Education (UK) Ltd 24-Hour emergency contact	Mei XIAN	07305020013	m.xian@hope-studyabroad.com
LSP	Suffolk Safeguarding Partnership	0808004005	<a href="mailto:Enquiries@suffolk.org.uk">Enquiries@suffolk.org.uk</a>
LADO	Suffolk Safeguarding Partnership	03001232044	LADOCentral@suffolk.gcsx.gov.uk

## Child Protection Principles

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

- Hope International Education (UK) Ltd 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 UK Office Director of the company has overall responsibility and accountability for the safeguarding and welfare of the students;
- All staff, homestays and volunteers share in the responsibility to protect students from harm, remain vigilant in identifying safeguarding and child protection issues and to follow policies and procedures relating to safeguarding and child protection;
- Students and staff have effective means by which they can raise child protection concerns or report issues;
- Staff have at least one reliable means to contact all students quickly and directly;
- Staff are aware of the medical or learning needs of individual students via the Student Record and these are shared with the homestay on a need to know basis;
- In cases where the whereabouts of a student under Hope International Education (UK) Ltd 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.

Hope International Education (UK) Ltd 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 Hope International Education (UK) Ltd will ensure the child's wishes and feelings are taken into account. We provide clear information for students in the student handbook. We check that students understand the information and are comfortable about how they can raise a concern. We explain how concerns will be treated seriously, and that students can safely express their views and give feedback.

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

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

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

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, Hope International Education (UK) Ltd undertakes the following:

1. We ensure 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 Hope International Education (UK) Ltd 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 *Hope* International Education (UK) Ltd 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.

7. Hope International Education (UK) Ltd will 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 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 2025 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101222/keeping-children-safe-in-education-2025.pdf)
- [Working together to safeguard children 2026](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/101222/working-together-to-safeguard-children-2026.pdf)

## Definitions

Term	What this means
Safeguarding and promoting the welfare of children	is defined as: <ul style="list-style-type: none"> <li>● protecting children from maltreatment;</li> <li>● preventing impairment of children's mental and physical health or development;</li> </ul>

	<ul style="list-style-type: none"> <li>• ensuring that children grow up in circumstances consistent with the provision of safe and effective care;</li> <li>• taking action to enable all children to have the best outcomes.</li> </ul>
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.

## Abuse, neglect and exploitation

(Taken from *Keeping Children Safe in Education* 2025)

- All staff, volunteers and homestays should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff and contracted inspectors are able to identify cases of children who may be in need of help or protection.
- All staff and contracted inspectors should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.
- All staff, volunteers and homestays, but especially the designated safeguarding lead (DSL) and deputies should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- All staff, volunteers and homestays should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online. This may include abusive, harassing, misogynistic or misandrist messages, the non-consensual sharing of indecent images (particularly within group chats), and the sharing of abusive images or pornography with individuals who do not wish to receive such content.
- All staff, volunteers and homestays should also be aware of emerging online safeguarding risks, including misinformation, disinformation, conspiracy-driven content and the misuse of generative artificial intelligence (AI). These risks may influence children's behaviour, wellbeing and vulnerability to exploitation or radicalisation, and should be considered as part of the setting's wider safeguarding approach.

- Staff should understand that safeguarding incidents and behaviours associated with online safety can affect children both inside and outside the school or college environment. Appropriate filtering, monitoring and staff vigilance are essential components of effective safeguarding practice.

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

## Types of abuse and neglect

(Taken from *Keeping Children Safe in Education* 2025)

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or making fun of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the

exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

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

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

## Signs of Abuse and Neglect

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

## Common signs

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

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

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

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

## Indicators of Physical Abuse

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

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

Physical abuse symptoms include:

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

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

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

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

Visible signs include:

- swelling
- bruising
- fractures
- being extremely sleepy or unconscious
- breathing problems
- seizures
- vomiting
- unusual behaviour, such as being irritable or not feeding properly

### Indicators of Emotional Abuse

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

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

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

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

Children might:

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

## Indicators of Sexual Abuse

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

### Emotional and Behavioural signs

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

### Physical Signs

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

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

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

## Indicators of Neglect

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

### Poor appearance and hygiene

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

### Health and development problems

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

### **Housing and family issues**

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

### **Change in behaviour**

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

## **Procedures**

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

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

- All staff members and homestays have a duty to identify and respond to suspected / actual abuse or disclosures of abuse. Any member of staff, volunteer or homestays who receives a

disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the DSL.

- Where there is risk of immediate harm, concerns will be referred immediately by telephone to the LSP 03001232044 or the Police.
- Less urgent concerns or requests for support, including for Early Help, will be sent by the DSL to the LSP via MASH 03456061499.
- The DSL may also seek advice from Social Care or another appropriate agency about a concern, if we are unsure how to respond to it.
- The DSL will refer any safeguarding concerns that relate to an incident in school to the school. Concerns will be referred to the school DSL. If an allegation is made against a member of school staff, the guardianship organisation will check the school policy to see who to refer such matters to. This is usually the Head of the School. If the allegation involves the Head, then usually the chair of governors should be informed.
- Where a concern is not seen to reach the threshold for a referral, the DSL will keep the concern on file and will monitor the situation. Should the concern escalate, a referral will be made to the LSP.
- Wherever possible, we will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to consult with the LSP and/or Police for advice on when to share information with parents / carers.
- If a member of staff or homestay continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, the staff member or homestay concerned should press for reconsideration of the case with the designated safeguarding lead.
- If, for any reason, the DSL is not available, or you do not feel that your concern is being taken seriously, this should not delay appropriate action being taken. Any individual may refer to the LSP or Police where there is suspected or actual risk of harm to a child. The contact details are included at the beginning of this policy.
- Full records of reports and action taken will be maintained by the DSL and securely stored in a specific safeguarding file.

## How Hope International Education (UK) Ltd will respond to child-on-child Abuse

All staff and homestays should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it **can** happen both inside and outside of school or college and online. That may mean it happens whilst students are in the care of homestays. It is important that all staff and homestays recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

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

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

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

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

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Hope International Education (UK) Ltd has the following procedures that help to minimise the risk of child-on-child abuse:

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

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

#### How students can raise a concern

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

#### How allegations will be recorded, investigated and dealt with

- All reports of child-on-child abuse will be made on a case-by-case basis with the DSL taking a leading role using their professional judgement and supported by other agencies such as social care or the police as required.
- Hope International Education (UK) Ltd asks staff and homestays 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 Hope International Education (UK) Ltd 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 *on a risk assessment form electronically* and be kept under review.

The DSL will ensure they are engaging with their LSP.

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

Hope International Education (UK) Ltd will support students who have been involved in child-on-child abuse. This could include:

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

### Management of the report

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

- Manage internally (including liaising with the student's 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, Hope International Education (UK) Ltd will consult with the police regarding how this case should be managed.

Hope International Education (UK) Ltd expects all staff and homestays to be clear on the policy and procedures with regards to child-on-child abuse outlined in this policy and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Hope International Education (UK) Ltd 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

- guidance should be followed where it is alleged that anyone working, volunteering or hosting students for Hope International Education (UK) Ltd 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, Hope International Education (UK) Ltd 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* Hope International Education (UK) Ltd who will act as “case manager”. The *director* must contact the LADO immediately and follow their advice. They **must not** investigate themselves before contacting the LADO. If the allegation is about the *director*, please contact the LADO directly.
- Hope International Education (UK) Ltd will report promptly to the DBS any person whose services are no longer used for regulated activity because they have caused harm or posed a risk of harm to a child.
- Any historical allegations should be referred to the police if they are made by an adult. If they are made by a child, they should be reported to the LADO.

### Allegations that do not meet the threshold

Low level concerns: Hope International Education (UK) Ltd 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 Hope International Education (UK) Ltd. It is imperative that staff understand the importance of reporting any concerns that they may have.

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

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

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

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

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

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

The safety and wellbeing of students in our care is dependent on the vigilance of all our staff, volunteers and homestays and their prompt communication to the DSL or *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. Hope International Education (UK) Ltd is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside our care. The notification and prompt handling of all concerns about adults is fundamental to safeguarding students. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Our separate Low Level Concern Policy outlines how we will manage and record any low-level concerns and take appropriate action to safeguard children.

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

### Learning Lessons

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

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

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

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

### How to receive a disclosure from a child or young person

- Victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.
- Reassure the child and listen carefully – it is important that they know you believe them.
- Do not say you will not say anything to anyone – in fact you have a duty to disclose this to another person so do not promise confidentiality.
- Make sure you take detailed notes, write everything down. If you are unable to take notes at the time, you should do so as soon as you are able.
- Ask open questions if appropriate, do not lead the conversation to find out what has happened. Use words such as tell me, explain or describe, and allow the student to speak.
- Avoid words such as what, why, how when – these will be asked by the relevant agency if appropriate.
- Ensure that you notify the police by calling 999 if you believe that the young person is at immediate or serious risk of harm.
- Contact the DSL Mei XIAN 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 07305020013. Sharing Safeguarding Information

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

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

Hope International Education (UK) Ltd 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 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 director 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	Mei XIAN	07305020013	m.xian@hope-studyabroad.com

24-Hour emergenc y contact	Mei XIAN	07305020013	m.xian@hope-studyabroad.com
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## Anti-Radicalisation and Prevent

Students may be susceptible to radicalisation into terrorism. Similar to protecting students from other forms of harms and abuse, protecting students from this risk is part of our safeguarding approach. Hope International Education (UK) Ltd has a separate policy that outlines our procedure for Anti-Radicalisation and Prevent. This can be obtained by email.

### Prevent Lead Contact Details

Role	Name	Telephone Number	Email
Prevent Lead	Mei XIAN	07305020013	m.xian@hope-studyabroad.com

## Record keeping

Hope International Education (UK) Ltd 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.

Hope International Education (UK) Ltd 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 on 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**

Hope International Education (UK) Ltd will ensure that all staff and homestays receive training and regular updates that are suitable for their roles. A formal record of all safeguarding training will be kept.

## **DSL**

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

## **Other staff and homestays**

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

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

## **Whistleblowing**

Hope International Education (UK) Ltd 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)

Hope International Education (UK) Ltd will liaise with their Local Safeguarding Partnership (LSP) and work in partnership with other agencies in line with Working Together to Safeguard Children 2026.

Partner schools have their own safeguarding policies. These can be found on their website and will include the contact details for their LSP. Hope International Education (UK) Ltd recognises that if any safeguarding concerns occurred whilst a student was in a homestay that was out of the school's county then a different/additional LSP arrangement would be required as well. In this case, Hope International Education (UK) Ltd 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 Hope International Education (UK) Ltd operates in the table below.

In the event of any contact information difficulties then Hope International Education (UK) Ltd 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	Suffolk Safeguarding Partnership	0808004005	Enquiries@suffolk.org.uk

LADO	Suffolk Safeguarding Partnership	03001232044	LADOCentral@suffolk.gcsx.gov. uk
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## 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.
- Hope International Education (UK) Ltd will not usually share safeguarding information with agents unless it is necessary to safeguard the student. In this case information will be provided on a need-to-know basis and on the understanding that it should be kept strictly confidential.

## Further Detail on specific types of abuse

The following information is taken from Keeping Children Safe in Education. It has been edited so that where appropriate, references to schools and colleges have 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 2025 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/91222/keeping-children-safe-in-education-2025.pdf) for further details, including additional types of abuse.

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

## Safeguarding issues

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

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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

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

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

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

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

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.
- have excessive or secretive use of mobile phones or online platforms;
- are found in possession of drugs, weapons or unexplained items; or
- become isolated from family and friends.

Staff should be aware that exploitation increasingly occurs both online and offline, and that technology, including social media, messaging platforms and live-streaming services, may be used to groom, coerce or control children.

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

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

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

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected development norms or become pregnant.
- share, receive or are pressured into creating indecent images.

Staff should also be alert to emerging online safeguarding risks, including exploitation facilitated through social media platforms, encrypted messaging apps, gaming environments, misinformation, disinformation and AI-generated or manipulated sexual content.

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

## 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 activity in a range of settings, including schools (including special schools), colleges, alternative provision settings, pupil referral units, children's homes and care environments.

Children are increasingly being targeted and recruited online, including through social media platforms, gaming platforms, encrypted messaging apps and live-streaming services. Technology is now recognised as a significant factor in the grooming and control of children involved in criminal exploitation.

Children can become trapped by this type of exploitation, as county lines gangs may create drug debts that children are told they must repay, or threaten serious violence, harm, sexual violence or kidnap towards victims and their families if they attempt to leave the network.

Many of the indicators for Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE), detailed above, may also apply to children involved in county lines activity. Additional indicators that a child may be criminally exploited through county lines include children who:

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

Staff should be aware that children involved in county lines activity may be both victims and perpetrators, and safeguarding responses should recognise the child’s vulnerability and potential exploitation.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office and The Children’s Society County Lines Toolkit For Professionals](#).

## Mental Health

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

Hope International Education (UK) Ltd will pay due consideration, and a full risk-assessment will be undertaken prior to taking guardianship of a student with mental health issues to ensure that the student’s needs can be met.

Where students require medication for a mental health concern whilst with a homestay Hope International Education (UK) Ltd will provide homestays with written instructions on a medication form. Homestays should record the dates and times any medication is given on the form provided. This form should be returned to the guardianship office after the student’s stay.

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

Where children have experienced abuse, neglect, exploitation, trauma or other adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and adulthood. It is important that staff and homestays understand how these experiences may affect a child's mental health, behaviour, attendance, relationships and educational progress.

Staff and homestays should recognise that safeguarding incidents and mental health concerns can be closely linked, and that online experiences, including cyberbullying, exploitation, social media pressures, misinformation, disinformation and harmful online content, may negatively affect a child's mental health and wellbeing.

Guardianship organisations can access a range of advice and support to help identify children who may need additional mental health support, including through partnership working with external agencies and specialist services.

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

Staff and homestays should also be aware of the importance of promoting emotional wellbeing, resilience, online safety and early intervention as part of a whole-setting safeguarding approach.

Resources to support children and young people's mental wellbeing are available through:

- [Every Mind Matters](#)
- [Mental health and behaviour in schools guidance](#)

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

There may be instances where Hope International Education (UK) Ltd is asked to remove a student with mental health issues from a school setting. Hope International Education (UK) Ltd will work with the student's school to support the student in the best way possible.

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

## Sexual violence and sexual harassment between children in schools and colleges

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 or sexual harassment will likely find the experience stressful, traumatic and distressing. Such experiences are likely to adversely affect a child's emotional wellbeing, mental health and educational attainment, particularly where the alleged perpetrator attends the same school, college or educational setting. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of Keeping Children Safe in Education 2025.

Staff and homestays should recognise that some groups may be more vulnerable or at greater risk, including girls, children with Special Educational Needs and Disabilities (SEND), LGBT+ children, children who are perceived as different, and children who may be isolated or vulnerable online.

Staff and homestays should be aware that sexual harassment and abuse increasingly occur through online platforms, including social media, group chats, gaming environments, image-sharing platforms and the misuse of artificial intelligence (AI)-generated or manipulated sexual content.

Staff and homestays should understand the importance of:

- challenging inappropriate behaviours immediately;
- 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”;
- recognising that harmful sexual behaviour can occur both online and offline simultaneously;
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.
- understanding that dismissing, downplaying or tolerating such behaviours can lead to the normalisation of abuse and may create an unsafe environment for children.

Staff should also remain professionally curious about patterns of behaviour, peer dynamics, coercion, online influence and emerging safeguarding risks linked to misogyny, misandry, exploitation, misinformation and harmful online content.

Further guidance is available from:

- [Keeping Children Safe in Education 2025 – Part Five](#)
- [Sexual violence and sexual harassment between children in schools and colleges](#)

### **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.

Staff and homestays should be aware that children may not always make a direct disclosure and that concerns may instead present through behaviour, attendance, emotional wellbeing, online activity or peer relationships. Maintaining professional curiosity and responding calmly, consistently and supportively are essential safeguarding practices.

Staff and homestays should also recognise that incidents may occur both online and offline, including through social media, group chats, image sharing, gaming platforms and AI-generated or manipulated sexual content.

If staff or homestays have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 51 in Part one of Keeping Children Safe in Education 2025. 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 without delay.

### **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).

Staff and homestays should be aware that recruitment into serious violence and criminal exploitation increasingly occurs online, including through social media platforms, gaming environments, messaging apps and other digital communication methods.

All staff and homestays should understand the range of factors that may increase a child's vulnerability to serious violence. These can include but are not limited to having been frequently absent or permanently excluded from educational settings, previous experience of abuse, neglect, exploitation or trauma; involvement in offending behaviour, including theft, robbery or drug-related activity. Association with gangs or criminal networks; substance misuse; social isolation or vulnerability online; and exposure to domestic abuse or violence.

Staff should recognise that children involved in serious violence may be victims of exploitation themselves and should be safeguarded accordingly.

Advice for schools, colleges and safeguarding organisations is available in:

- [Criminal exploitation of children and vulnerable adults: county lines guidance](#)
- [Keeping Children Safe in Education 2025](#)

### Children who are absent from education

All staff and homestays should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, children missing education altogether, can be a significant warning sign of a range of safeguarding concerns.

This may include abuse and neglect, including sexual abuse or exploitation, and may also indicate child criminal exploitation, including involvement in county lines activity. It may further indicate mental health concerns, substance misuse, risk of radicalisation, travelling to conflict zones, female genital mutilation (FGM), so-called "honour-based" abuse, forced marriage or other forms of exploitation.

Staff and homestays should also be aware that persistent absence or disengagement from education may be linked to online harms, including grooming, exploitation, cyberbullying, harmful online influences, misinformation, disinformation and coercion through digital platforms.

Early identification and intervention are essential in order to identify any underlying safeguarding concerns and help prevent children from going missing in the future.

If staff or homestays suspect that a student is missing from education, they should contact the student's school or college immediately and follow the organisation's safeguarding and reporting procedures. The school or college will have procedures in place for managing and reporting absence.

## Modern Slavery and the National Referral Mechanism

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

Staff and homestays should be aware that children may be trafficked or exploited both in person and online, and that vulnerable children may be groomed, controlled or coerced through the use of technology and social media.

Indicators of modern slavery may include unexplained absences, fearfulness or anxiety, poor physical or emotional wellbeing, signs of control by others, lack of freedom of movement, possession of multiple phones or unexplained money and evidence of exploitation or coercion.

Further information on identifying victims of modern slavery, the support available and referrals to the National Referral Mechanism (NRM) is available in:

- Modern slavery: how to identify and support victims
- [Keeping Children Safe in Education 2025](#)

## 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, digital devices or online networks). 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 alter grades;
- 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, obtaining or using malware (malicious software), including viruses, spyware, ransomware, botnets and Remote Access Trojans (RATs), with the intention of committing further offences.

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

Staff and homestays should recognise that online activity can present safeguarding risks as well as criminal risks, and that some children involved in cybercrime may themselves be vulnerable to exploitation, coercion, online harm or criminal influence.

If there are concerns about a child in this area, the Designated Safeguarding Lead (DSL), or a deputy, should consider referral to the Cyber Choices programme. Cyber Choices is a national police initiative, supported by the Home Office and led by the National Crime Agency (NCA), which aims to identify and support young people at risk of becoming involved in cyber-dependent offending and encourage the positive use of their skills and interests.

Staff should also be aware that children may be exposed online to harmful communities, extremist material, criminal networks, misinformation, disinformation or AI-assisted criminal activity, which may increase safeguarding concerns and vulnerability.

Cyber Choices does not currently cover cyber-enabled offences such as fraud, the online purchase of illegal substances, child sexual abuse and exploitation, online bullying or broader online safety concerns. These issues should be addressed through safeguarding procedures and wider online safety policies.

Additional guidance and support are available from Cyber Choices, NPCC – When to Call the Police

- [National Cyber Security Centre \(NCSC\)](#)
- [Keeping Children Safe in Education 2025](#)

### **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 that staff and homestays understand this dynamic and consider the additional safeguarding risks when assessing and responding to concerns. All forms of HBA are abuse, regardless of the motivation, and should be recognised, responded to and escalated as safeguarding concerns.

Professionals, staff, homestays and individuals working with children should remain alert to the possibility that a child may be at risk of HBA or may already have experienced such abuse.

Staff and homestays should be aware that children at risk of HBA may experience coercion, control, intimidation, emotional abuse, surveillance or isolation, including through online platforms, social media or digital communication.

Indicators that a child may be at risk can include extended absences from education, fear of upcoming holidays or overseas travel, sudden restrictions on friendships or social activities, increased family control, emotional distress, anxiety or self-harm, discussions of family "honour" or shame; or concerns raised by peers or siblings.

Staff should also be aware that children may find it difficult to disclose concerns due to fear, family pressure, cultural expectations or loyalty conflicts. Maintaining professional curiosity and responding sensitively and promptly are essential.

All concerns relating to HBA should be reported immediately in accordance with safeguarding and child protection procedures, and advice should be sought from the Designated Safeguarding Lead (DSL) or a deputy without delay.

Further guidance is available from:

- [Keeping Children Safe in Education 2025](#)
- [Forced marriage guidance \(GOV.UK\)](#)
- [Female genital mutilation guidance \(GOV.UK\)](#)

## 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.

All staff and homestays should be alert to the possibility that a child may be at risk of FGM, may have already undergone FGM, or may disclose concerns relating to themselves, siblings or peers.

Possible indicators may include a prolonged or unexplained absence from school or education, a child discussing a special ceremony, holiday or overseas travel, reluctance to participate in physical activities, difficulty walking, sitting or standing, emotional distress, anxiety or withdrawal; or requests for help from the child or concerns raised by peers.

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 directly to the police.

Staff and homestays should be aware that children at risk of FGM may also experience wider safeguarding concerns, including coercive control, so-called “honour”-based abuse, emotional abuse, isolation or restrictions imposed by family or community members.

Staff should respond sensitively and professionally to any disclosure or concern relating to FGM, recognising that children may feel frightened, conflicted or under pressure from family or community expectations.

Further details can be found in Annex B of:

- [Keeping Children Safe in Education 2025](#)
- [Female genital mutilation guidance \(GOV.UK\)](#)

## 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.

Since February 2023, it has been a criminal offence to carry out any conduct intended to cause a child under the age of 18 to marry, even where violence, threats or coercion are not used. This applies to both legally recognised marriages and non-legally binding or unofficial ceremonies.

Children at risk of forced marriage may experience family pressure or control, emotional or psychological abuse, restrictions on freedom or social activities, fear of overseas travel, sudden withdrawal from education, isolation from peers; or threats linked to family “honour”.

Staff and homestays should also be aware that coercion and monitoring may occur online, including through digital surveillance, social media, messaging platforms or family monitoring of communications and relationships.

All concerns relating to forced marriage should be treated as safeguarding concerns and reported immediately to the Designated Safeguarding Lead (DSL) or deputy. Staff should not attempt to mediate with family members or approach the family directly, as this may increase the risk to the child.

The Forced Marriage Unit (FMU) has published guidance including [The Right to Choose: Government Guidance on Forced Marriage](#) and Multi-agency Practice Guidelines: Handling Cases of Forced Marriage

School, college and safeguarding staff can contact the Forced Marriage Unit for advice and support:

- Telephone: 020 7008 0151
- Email: [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk)

Further guidance: [Keeping Children Safe in Education 2025](#)

## Domestic Abuse

The Domestic Abuse Act 2021 recognises the impact of domestic abuse on children, including where children see, hear or experience the effects of abuse and are therefore recognised as victims in their own right. The statutory definition of domestic abuse includes a range of abusive behaviours, including physical abuse, emotional abuse, psychological abuse, sexual abuse, economic abuse, coercive behaviour and controlling behaviour.

Under the Domestic Abuse Act 2021, both the person carrying out the behaviour and the person the behaviour is directed towards must be aged 16 or over and be “personally connected” as defined within the 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.

All children can be affected by domestic abuse within their home environment. Experiencing domestic abuse can have serious, long-lasting emotional, psychological, behavioural and educational impacts on children and young people. Children may feel frightened, anxious or isolated, blame themselves for the abuse, experience emotional distress or trauma, demonstrate changes in behaviour or attendance; or be forced to leave the family home as a result of abuse.

Staff and homestays should be aware that domestic abuse may also involve online or digital forms of abuse, including monitoring devices, controlling social media use, online harassment, digital surveillance, coercive messaging and image-based abuse.

Young people may also experience domestic abuse within their own intimate relationships. This is sometimes referred to as teenage relationship abuse and may involve coercion, emotional manipulation, sexual violence, harassment, controlling behaviour or online abuse.

Where concerns exist regarding the safety or welfare of any child under the age of 18, safeguarding procedures must always be followed, regardless of whether the behaviour meets the statutory definition of domestic abuse.

Both victims and those displaying harmful behaviour should be offered appropriate safeguarding support and intervention, recognising that children who display abusive behaviours may also have experienced trauma, abuse or exploitation themselves.

Guardianship organisations should recognise that students may potentially experience domestic abuse within their family home, within intimate peer relationships; or whilst staying in homestay accommodation.

All concerns relating to domestic abuse should be reported in accordance with safeguarding and child protection procedures. Further guidance is available from:

- [Domestic Abuse Act 2021 Guidance](#)
- [Keeping Children Safe in Education 2025](#)

## Online safety

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

Hope International Education (UK) Ltd recognises that technology and the internet are significant components in many safeguarding and wellbeing issues, and that children may be at risk of harm online as well as offline.

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, misinformation and disinformation, racism, misogyny, self-harm, suicide or suicide-related content, anti-Semitism, radicalisation and extremism or AI-generated harmful or manipulated content.
- **contact:** Being subjected to harmful online interaction with others, including peer pressure, bullying or harassment, commercial exploitation, coercion, adults posing as children or young people for the purpose of grooming or exploitation; and online exploitation for sexual, criminal, financial or other purposes.
- **conduct:** Online behaviour that increases the likelihood of harm, including making, sending or receiving explicit images, consensual and non-consensual sharing of nudes and semi-nudes, sharing pornography or abusive content, online bullying or harassment, abusive, misogynistic or discriminatory behaviour; and unsafe or risky online challenges or interactions.
- **commerce** - risks such as online gambling, inappropriate advertising, phishing, scams, fraudulent activity; and financial exploitation.

If Hope International Education (UK) Ltd feels our students or staff are at risk, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Staff, volunteers and homestays should be aware that online harms may occur simultaneously with offline abuse and can contribute to safeguarding concerns including exploitation, sexual abuse, radicalisation, serious violence, mental health concerns and child-on-child abuse.

Particular attention should be given to emerging online risks linked to misinformation and disinformation, harmful algorithms and online influence, extremist or harmful online communities, AI-generated content and manipulated images, anonymous communication platforms and coercive or exploitative behaviour facilitated through technology.

Hope International Education (UK) Ltd recognises the significant risks posed to children online. Further guidance can be found within the organisation’s Online Safety Policy and Anti-Bullying (including Cyberbullying) Policy.

Hope International Education (UK) Ltd provides regular online safety and safeguarding training for staff, homestays and volunteers to ensure they understand current online risks, emerging trends and safeguarding responsibilities.

Further guidance:

- [Keeping Children Safe in Education 2025](#)
- [Teaching Online Safety in Schools](#)

## Review

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

This policy was last reviewed on: .....26/06/2026.....

Signed: *M.xian*.....

Date: .....26/06/2026.....

## Appendix 1: Incident Form

### CHILD PROTECTION RECORD – Report of a Concern

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



Reported to:		Role of person reported to:	
Signed:			

**For DSL/ DDSL use:**

Action taken:		Advice sought: <i>(from whom and what was advice given)</i>	
Concern / referral discussed with parent / carer?		<i>If not, state reasons why – if yes, note discussion with parent</i>	
Referral made:		<i>If not, state reasons why – if yes, record to whom and any action agreed</i>	
Feedback to referring member of staff or homestay:			<i>By whom</i>
Response to / action taken with student:			<i>By whom</i>
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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### Appendix 2: Student removal form

In order for us to support our student as best as possible, we would appreciate it if you could complete the following student removal form. Please note that a representative of *insert guardianship organisation name* will not be able to collect the student until this form has been completed and returned to us by email: *insert email address*.

School Name	
Student Name	
Date of Birth	
Reason for request of removal of student	
Has the student been assessed by a medical professional?  Date of assessment if applicable.  Please provide a summary of assessment if applicable.	Yes <input type="checkbox"/>  No <input type="checkbox"/>
Is the student at risk of harm to themselves?	Yes <input type="checkbox"/>  No <input type="checkbox"/>



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Is the student a risk to others?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Has the school followed its mental health and child protection policies and procedures?  Please provide a copy of any relevant policies and procedures.	Yes <input type="checkbox"/> No <input type="checkbox"/>
Any other additional information we should be made aware of	
Signature	
Name	
Position	
Date	