

QED Education Group

Safeguarding and Child Protection Policy

Policy Statement

QED Education Group 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. We ensure that we lead from the top by ensuring that our owner Qin Li has the appropriate safeguarding knowledge and involvement in the procedures we have in place. This includes having oversight of arrangements. If any parent or young person/child has any concerns about the conduct of any member of the organisation, this should be raised in the first instance with Katie Hu (Designated Safeguarding Lead at +447422 585956).

QED promises that student’s concerns will be treated seriously and that their wishes will be taken into account. QED Guardians is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers, homestays and any individual working with the organisation to share this commitment. This is reflected in all child protection policies, safer recruitment, our ongoing training programme and additional welfare support offered to our students. Every young person in the care of QED Guardians should feel safe and protected from any form of abuse or neglect.

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 KCSIE 2022 and Working Together to Safeguard Children 2018. It also makes use of guidance from the NSPCC website. 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. QED Education Group advises all staff, homestays and volunteers who come into contact with children to have read this document. This can be found here 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. QED Education Group 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: information for all school and college staff \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/61212/Keeping_Children_Safe_in_Education.pdf) Annex A of *Keeping Children Safe in Education* is a condensed version of Part one of *Keeping Children Safe in Education*. QED Education Group advises all staff who do not directly work with children to read this document instead of part one.

Key Safeguarding Contact Details

Role	Name	Telephone Number	Email
Designated Safeguarding Lead (DSL)	Katie Hu	07305 618459	katie.hu@qededucationgroup.co.uk
Deputy Designated Safeguarding Lead (DDSL)	Nikki Li	07305 618459	katie.hu@qededucationgroup.co.uk
QED Education Group 24-Hour emergency contact	Yu Fang Jin	07762 572532	yufang.jin@qededucationgroup.co.uk
LSP	Windsor and maidenhead Local Safeguarding Children Board	01628 683234	lscb@rbwm.gov.uk
LADO	Windsor and Maidenhead area	01628 683202 or 07774 332675	LADO@achievingforchildren.org.uk

Child Protection Principles

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

- QED Education Group 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 Managing Directors of the company have overall responsibility and accountability for the safeguarding and welfare of the students;
 - All staff 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;
 - In cases where the whereabouts of a student under QED Education Group 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.

QED Education Group 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.

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
- 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, QED Education Group undertakes the following:

1. Training is provided for all staff and homestays to a level appropriate for their role (see training section below);
2. We promote an environment of trust, openness and clear communication between students, school and QED Education Group staff and our Homestays, so that student welfare, safety and pastoral care is recognised as the top priority;
3. We respond to any reported allegation or suspicion of child abuse in accordance with QED Education Group procedures as outlined below;
4. 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;
5. We maintain links with the appropriate agencies who have a statutory responsibility to

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

Supporting procedures

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

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

Definitions

Term	What this means
Safeguarding and promoting the welfare of children	is defined as: • protecting children from maltreatment; • preventing impairment of children's 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 possibly a deputy) will be trained to a higher level.
Prevent	Safeguarding and supporting those vulnerable to radicalisation.
Local Safeguarding Partnership (LSP)	Local authority to support organisations in safeguarding children
LADO Local Authority Designated Officer	For all allegations against Staff and Volunteers
Children	'Children' includes everyone under the age of 18.

What is abuse and neglect?

- Knowing what to look for is vital to the early identification of abuse and neglect. All staff and homestays should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff or homestays are unsure, they should always speak to the DSL (or DDSL).
- All staff and homestays should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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 a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. 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.

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/>

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

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

- All staff members and homestays have a duty to identify and respond to suspected / actual abuse or disclosures of abuse. Any member of staff, volunteer or homestays who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the DSL or the Advocation Manager in their absence
- Where there is risk of immediate harm, concerns will be referred by telephone to the
- LSP /NSPCC or the Police.
- Less urgent concerns or requests for support will be sent to the LSP via lscb@rbwm.gov.uk
- 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. 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.

- If, for any reason, the DSL (or DDSL) is not available, or you do not feel that your concern is being taken seriously, this should not delay appropriate action being taken. Any individual may refer to the LSP where there is suspected or actual risk of harm to a child. The contact details are included at the beginning of this policy.
- 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.
- If the allegation is made about a member of the guardianship organisation staff or homestay, the DSL must contact the LADO and follow their advice. They **must not** investigate themselves. If the allegation is about the DSL, please contact **Qin Li (the Founder & CEO, qin.li@qededucationgroup.co.uk)** who will contact the LADO and follow the advice as above.
- 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.
- 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.
- Full records of reports and action taken will be maintained by the DSL and securely stored in a specific safeguarding file.

How to receive a disclosure from a child or young person

- 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
- 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 Katie Hu 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 07305 618459

Sharing Safeguarding Information

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'.

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 and DDSL will only disclose information about a child to other members of guardianship organisation staff, homestays or the DSL of the school that the student attends on a need to know basis.

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

Role of DSL and DDSL

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

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

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;
- support staff and homestays who make referrals to the Channel programme;
- 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 [owner/ managing director] to inform him or her 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.
 - ensure the guardianship organisation's child protection policies are known, understood and used appropriately;
- ensure the child protection policy is reviewed annually (as a minimum) and the

procedures and implementation are updated and reviewed regularly, and work with the CEO regarding this;

- ensure the child protection policy is available for all relevant parties on QED Education Group Website.
- link with the safeguarding partner arrangements to make sure staff and homestays are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Contact Details for the DSL and DDSL

Role	Name	Telephone Number	Email
DSL	Li Hu	07305 618459	katie.hu@qededucationgroup.co.uk
DDSL	Nikki Li	07716 449975	Nikki.li@qededucationgroup.co.uk
24-Hour emergency contact	Yufang Jin	07762 572532	Yufang.jin@qededucationgroup.co.uk

Prevent

QED Education Group has a separate policy that outlines our procedure for Anti-Radicalisation and Prevent. This can be found at office of QED Education Group

Prevent Lead Contact Details

Role	Name	Telephone Number	Email
Prevent Lead	Li Hu	07305 618459	katie.hu@qededucationgroup.co.uk

Record keeping

QED Education Group will keep full records of any safeguarding concern reported to them. Safeguarding records will be stored securely and separately to the general student files. These will be stored confidentially by the DSL in either a locked cabinet (hard copies) or a password protected file. Only the DSL and DDSL will have access to these files.

Records will be detailed and accurate (either handwritten or using appropriate secure online software). These will include all concerns about a student even if there is no need to make an immediate referral and record the rationale for decisions made and action taken. Copies of any correspondence or notes from conversations with the LSP, school DSL or

other external agency will be included in the file.

QED Education Group 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,

Training and updates

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

DSL and DDSL

The DSL and DDSL will attend suitable 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 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 QED Education Group'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.

Keeping Children Safe in Education' (2022):

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

Working Together to Safeguard Children, 2018

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf

Statutory Guidance on Children who Run away or Go Missing from Home or Care, January 2014:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care_3.pdf

What to do if you're worried a child is being abused –

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf

Children Missing from Education – September 2016 Children missing education –

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/579401/Children_missing_from_education.pdf

[hment data/file/550416/Children Missing Education - statutory guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)

Disqualification under the Childcare Act 2006 (2018):

<https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006/disqualification-under-the-childcare-act-2006>

Prevent Duty Guidance: for England and Wales (April 2021):

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

The Use of Social Media for On-line Radicalisation (July 2015)

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/440450/How_social_media_is_used_to_encourage_travel_to_Syria_and_Iraq.pdf

Children Missing Education – Statutory guidance for local authorities (DfE

September 2016). https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf

Low Level Concerns

As detailed in Keeping Children Safe in Education (2022), QED will promote a transparent and open culture about all concerns raised about adults working with young people. All concerns will be reviewed and responded to promptly and appropriately. By creating an environment whereby all concerns raised is critical as, if successful, it allows us to identify and review appropriate behaviours, minimising the risk of abuse and ensure that those working with or on behalf of QED are promoting our ethos and values, in line with our Code of Conduct.

Low level concern does not mean that the concern is insignificant. It encapsulates any concern or 'nagging doubt' about an adult working for or on behalf of QED; specifically, those which do not meet the threshold for referral to LADO, or are inconsistent with the Code of Conduct (including behaviours outside of work).

Any low-level concerns should be shared with the Designated Safeguarding Lead, so that they can be dealt with appropriately and within a timely manner. The Designated Safeguarding Lead may, where appropriate discuss confidentially with the LADO for advice, if required. Efficient resolution of low-level concerns both prevents children from harm, and the company from becoming the subject of misunderstanding or issue.

Low concerns policy:

<http://qededucationgroup.co.uk/wp-content/uploads/2022/11/Low-Level-Concern-Policy.pdf>

Responding to low-level concerns about adults working in education:

<https://learning.nspcc.org.uk/news/2021/october/responding-low-level-concerns-in-education>

Whistleblowing

QED Education Group 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)

QED Education Group will liaise with their Local Safeguarding Partnership (LSP) and work in partnership with other agencies in line with *Working Together to Safeguard Children*.

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

Role	Name	Telephone Number	Email
LSP	Windsor and Maidenhead safeguarding partnership	01628 683234	lscb@rbwm.gov.uk
LADO	Windsor and Maidenhead Local Authority Designated Officer	01628 683202 or 07774 332675	LADO@achievingforchildren.org.uk

Contact Details for LSPs and LADOs across the areas that QED Education Group operates

Area	Role and Name of contact	Telephone Number	Email
Windsor	Multi Agency Safeguarding Hub (MASH) Windsor and Maidenhead	01628 683150	MASH@rbwm.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.
- QED Education Group 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 (2022)*. Please refer to this document for further details, including additional types of abuse.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf

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, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

How QED Education Group will respond to child-on-child Abuse

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

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

QED Education Group 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).
- QED Education Group has the following procedures that help to minimise the risk of child-on-child abuse:
 - Regular training for staff and homestays
 - Educating students through our handbooks and through discussion
 - Providing students with clear guidelines within the student handbook on how to raise a concern.
 - Fostering effective channels of communication so that students feel comfortable approaching their homestay carer or guardian with any concerns.
 - Effective communication between the DSL (and DDSL) with the DSL in schools where students are placed.

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

- **Serious violence**

All staff and homestays should be aware of indicators, which may signal that 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.

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 child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation 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.

Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
 - can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can take place in person or via technology, or a combination of both;
 - can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
 - can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
 - is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of

other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Some of the following signs may be indicators of child sexual exploitation:

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

Child criminal exploitation: county lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources

Honour-based violence (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' violence (including Female Genital Mutilation and Forced Marriage) So-called 'honour-based' violence (HBV) 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 HBV 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 HBV, or already having suffered HBV.

Actions

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. In schools, where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers- 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.

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.

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 communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

Domestic Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional.

Exposure to 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

Online safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.

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

- **content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

QED Education Group recognises the risks posed to students online. Further information can be found in the e-safety and bullying (including cyber-bullying) policies.

Review

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

This policy was last reviewed on:12/08/2022.....

Signed:*Qin Li*.....

Date:.....12/08/2022.....

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:	• <i>use initials for other children / young people involved, unless there is a specific need to name them in full</i> • <i>contemporaneous notes, if taken, may be attached to this form</i>		
Reported to:		Role of person reported to:	

Signed:	
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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			