Gateway Safeguarding Policy

Issue:3

Issue date: June 2021

Review date: September 2021

Gateway Mission Statement

To empower globally mobile students to achieve exceptional education milestones by providing high-quality, flexible learning experiences that instil connectedness, individual responsibility and a desire for high achievement.

Contents

Safeguarding is defined by the UK government as 'the process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully'.

1. PURPOSE

1.1 The purpose of this policy is to determine the principles and rules which define Gateway's approach to safeguarding.

1.2 The objective of this safeguarding policy is:

- To protect children, young people and adults at risk (where a child is defined as a person under the age of 18[1] (The Children Act 1989)) who receive Gateway services, from all forms of abuse – namely neglect, physical, sexual or emotional abuse (see Annex 2 – Types of Abuse)
- To provide all adults associated with Gateway including staff, sessional workers, volunteers and host families, with the underpinning principles, rules and framework within which they must operate when fulfilling their duties and responsibilities for any Gateway activity.

2. SCOPE

2.1 This policy has been written to consider the end to end lifecycle of the Gateway Homestay Programme which is shown in Figure 1.
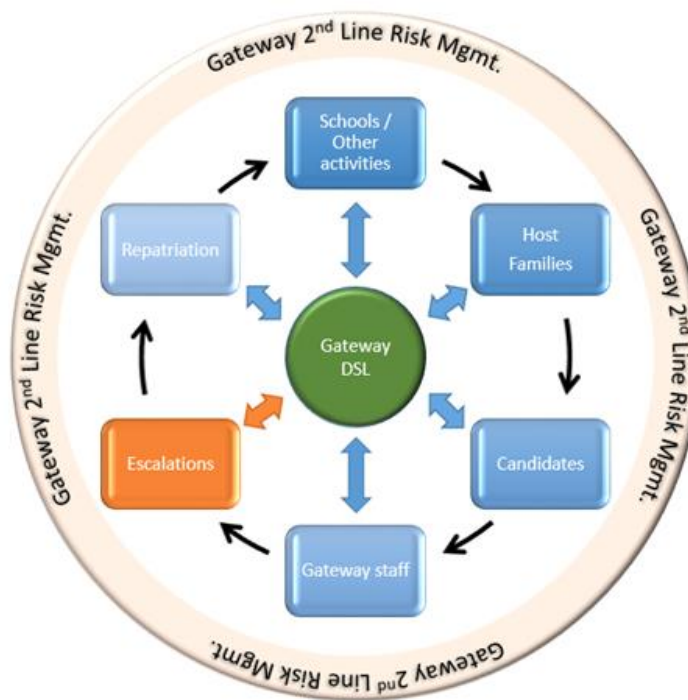

Figure 1: Gateway Homestay Business Lifecycle

2.2 This policy applies to <u>all staff, temporary staff, volunteers, host families or anyone working on behalf of Gateway</u> (referred to in this policy as 'responsible adults' or SLOs – Student Liaison Officers).

2.3 The implementation of this policy is mandatory across all areas and activities of Gateway. This policy applies to <u>all Gateway activities</u>.

2.4 Gateway aims to protect all individuals associated with Gateway from harm, whether they are Gateway's management team, recipients of Gateway's service, providers of Gateway's service or other organisations that it works with. However, the main focus of this policy as stated in 1.2 is to protect children, young people and adults at risk. The categorisation or definition is as below:

- Child U16 – Children who are under the age of 16
- Child or young person – Person under the age of 18

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[1] Or 20 if the child is disabled or has been in local authority care at any time since the age of 16.

- Child – If the child is disabled then under the age of 20
- Child in need - a child who is unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly impaired, without the provision of services; or a child who is disabled.
- Child who speaks English as an additional language
- Adult at risk or vulnerable adult – Person over the age of 18 who is at risk of harm or who lacks the absolute most basic human life skills

3. POLICY STATEMENT

3.1 Keeping Children Safe in Education 2020 and The Children Act 2004 places a statutory duty on organisations to have in place arrangements for carrying out its functions with a view to safeguarding and promoting the welfare of young people and vulnerable persons. This is further supported by the Education Act 2011 and the Children Act 1989 (Section 17 Child in Need (Provision of services for children in need, their families and others) and Section 47 Risk of Significant Harm (Local Authority's duty to investigate).

3.2 Gateway takes this duty seriously and works together with students, their parents, host families and schools to ensure children have the support they need.

3.3 In order to comply with this duty of care, all staff, temporary workers, volunteers and host families must be aware of the lines of communication and levels of responsibility which exist to ensure that matters of Safeguarding can be dealt with adequately.

3.4 Gateway is not an investigating agency. This function will normally be carried out by Social Services, or other agencies with statutory powers, i.e. the Police, as set out in the Northamptonshire Safeguarding Children Procedures or Northamptonshire Safeguarding Adults Policy & Procedure.

3.5 All responsible adults who come into contact with children and young people have a duty of care to safeguard and promote their welfare. Gateway recognise that therefore all responsible adults associated with Gateway must play an active part in child protection and child welfare.

3.6 All responsible adults associated with Gateway must be aware, vigilant and know they must report and how to report any concerns or allegations. They must know who to contact within Gateway and also outside the organisation.

3.7 Child protection refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- Protecting children from maltreatment, whether from an adult, a child/young person or another student
- Preventing impairment of children's health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care that foster security, confidence and resilience
- Providing an environment in which children and young people feel safe, secure, valued, respected, confident and know how to approach adults when in difficulties
- Taking action to enable all children to have the best life chances

3.8 Gateway believes that all children, regardless of age, disability, racial heritage, religious belief, sexual orientation, or identity have the right to equal protection from all types of harm or abuse.

3.9 Gateway takes a zero tolerance approach to safeguarding. All responsible adults working with Gateway are made aware through policy, induction training, regular supervision and discussions during team meetings that there will be zero tolerance towards breaches of this policy and are also made aware of their mandatory obligation to report any allegation of breaches.

3.10 Gateway is not an investigating agency. However, the need to establish whether escalation is necessary may lead to the DSL collecting/collating evidence and sharing with other agencies. This function will then continue to be carried out by Social Services, or other agencies with statutory powers, i.e. the Police, once a referral is made, as set out in the Northamptonshire Safeguarding Children Partnership.

3.11 Northamptonshire MASH refers to the Northamptonshire Multi-Agency Safeguarding Hub which is a dedicated team of child protection professionals. The MASH team brings together staff and information from the following agencies within Northamptonshire:
- Children's Social Care
- Crime Reduction Initiative
- Domestic Abuse Advisor

- Early Help Team
- East Midlands Ambulance Service
- Education / Schools
- Fire and Rescue Service
- Health / NHS
- Police
- Probation Service
- Youth Offending Team

Gateway, especially the Designated Safeguarding Lead (DSL), therefore works closely with Northamptonshire MASH regarding safeguarding incidents. Gateway does not investigate or treat; it refers to MASH and cooperates as instructed and required by the professional group within MASH who is assigned the case.

Please note that some Local Authorities do not have the MASH as their front door name.eg. Leicestershire County Council is called First Response. If the safeguarding concern is about a student that resides within another Local Authority, then the referral must be made to that Local Authority.

4. LEGAL FRAMEWORK

This policy has been drawn up on the basis of law and guidance in the UK that seek to protect children, namely:

- Children Act 1989
- United Convention of the Right of the Child 1991
- Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Children (Private Arrangements for Fostering) Regulations 2005
- Safeguarding Vulnerable Groups Act 2006 (SVGA)
- Protection of Freedom Act 2012
- Children and Families Act 2014
- SEND Code of Practice 2015
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2020
- Data Protection Act 2018

The policy is also consistent with The Northamptonshire Safeguarding Children Partnership

TYPES AND SIGNS OF ABUSE
4.1 What is abuse:
Abuse and neglect are forms 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 a stranger. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.

4.2 Types of abuse and exploitation include:

- **Sexual abuse**
- **Physical abuse**
- **Emotional abuse**
- **Neglect**
- 'So-called honour-based abuse'
- Child criminal exploitation
- Influences of extremism leading to radicalisation.
- Online abuse
- Sexual exploitation
- Trafficking

Further details about the types listed above can be found in Annex 2 – Threats to Children – Types of Abuse and Exploitation.

4.3 Some signs that could alert staff, and host families to the fact that a student might be being abused include:
- Something a child has said
- Unexplained bruising or injuries
- Sudden changes in behaviour or any behaviour that feels out of the ordinary for that child (such as withdrawn, anxious, clingy, depressed, aggressive, problem sleeping, eating disorders, wets the bed, soils clothes, misses school, changes in eating habits, obsessive behaviour, self-harm, thoughts about suicide)
- A change observed over a long period of time e.g. weight loss or being increasingly dirty or unkempt.
- Sexually explicit language and actions
- Consumption of alcohol or drugs

4.4 <u>If a child or young person displays these signs it does not necessarily mean that they are being abused.</u> Similarly there may not be any signs, but a suspicion that something is wrong. If so, it is not the individual's responsibility to decide if it is abuse but it is his/her responsibility to act on his/her concern and to report it appropriately by following the Logging a Concern process until the concern has been satisfactorily concluded (see the supporting document to this policy Gateway Safeguarding Procedures and Safeguarding Templates).

5. POLICY

This policy is supported by and should be read in conjunction with the 'Gateway Safeguarding Procedures' document, which provides supplemental details on how to implement this policy.

SCHOOLS

Legal Framework	The requirements below relate to Clause 5, 16 – 19 of Working Together to Safeguard Children 2018; Keeping Children Safe in Education 2020 Section 1 – 3, 7, 9 of SVGA and the Data Protection Act 2018.
Responsible personnel	School Partnerships Manager, Designated Safeguarding Lead (DSL) and Partner Schools

6.1 Gateway will ensure that any organisation it works with, such as all partner schools, have:
- A safeguarding policy in place that is aligned with the Gateway policy and owned, approved and refreshed on a regular basis or when there are changes in the business model
- At least one designated safeguarding lead with appropriate support
- Completed enhanced DBS checks on all staff working in the school
- Agreed process for advising Gateway of any changes in safeguarding policy, procedures or team

Gateway will assess schools using the 'Annex 4 – Schools Vetting for on-boarding' form that is owned and managed by the School Partnerships Manager and record the outcomes prior to start of arrangement. Detailed notes of each assessment will be stored in the respective school folders online.

6.2 If the assessment of the school uncovers any unsatisfactory findings related to the school, this will be raised to Gateway management by the School Partnership Manager. The management can then either:
- decide to not proceed to partner with the school, or
- it could allow a period of time for the school to address the gap or provide sufficient evidence to close out the outstanding points before a new intake of students from Gateway start at the school.

6.3 Gateway will ensure that all approved partner schools have signed agreements with Gateway, and that these are stored in the respective school folders online.

6.4 Gateway will share its safeguarding policy with partner schools to facilitate transparency and clear understanding of requirements.

6.5 Any school unable to meet any of Gateway's safeguarding requirements will only be partnered with if approved by Gateway leadership. Any breach of these requirements that are identified either during planned reviews or through ad hoc check-ins will result in termination of agreement if the matter is not resolved within 30 working days, or accepted by Gateway leadership.

HOST FAMILIES

Legal Framework	The requirements below relate to Part IX-Sections 66 – 70, Part XII-Section 87, Section 46, 47 of Children Act 1989; Clause 5, 13, 16 – 19, 24, 26 - 27 of Working Together to Safeguard Children 2020, Keeping Children Safe in Education 2020, Regulation 3, 5, 6, 10, 11 and Schedule 2 - 3 of Children (Private Arrangements for Fostering) Regulations 2005, Section 1 – 3, 7, 9 SVGA, and the Data Protection Act 2018.
Responsible personnel	Accommodation Officer(s), Head of Operations , Designated Safeguarding Lead (DSL) and Host Families

6.6   Gateway will identify suitable host families for students who are coming to study at day and boarding schools and need accommodation in the UK. This arrangement can be referred to as private fostering. Private fostering is the arrangement in which a student aged under 16 (under 18 if disabled) stays with a family who is not his/her own immediate family for 28 days or more. Gateway will notify the Local Authority prior to the start of all Private Fostering arrangements.

6.7   Gateway must undertake background checks to vet all members of the host families aged 16 and over at the time of application. This includes:
- Verifying all relevant information provided in the application form and telephone interview
- Thorough home visit completed and all findings stored in the host family folder
- Enhanced DBS checks completed and certificates received prior to the start of the arrangement

6.8   Gateway will ensure that all approved host families have signed agreements with Gateway and that these are stored in the respective host family folders online and hard copies archived.

6.9   The primary carer in the host families must undertake the mandatory safeguarding training.

6.10 Host families must treat the student's safety as priority at all times, including for online activities and take measures as appropriate to prevent any risk, hazard or harm to the student.

6.11 Host families shall ensure that students' welfare is of paramount importance, regardless of age, disability, racial heritage, religious belief, sexual orientation, or identity, when planning, organising, advising and delivering programmes.

6.12 Host families shall maintain an open and honest relationship with the student, enabling and encouraging them to speak about matters of concern and safety, such as abuse in person or online, and enable them to quickly establish clear networks of support within home and school.

6.13 Host families are strictly prohibited from engaging in any form of sexual activity with students. They are reminded that according to the Sexual Offences Act 2003, any person in a Position of Trust engaged in sexual activity of any sort with students under the age of 18 is breaking the law. This will result in dismissal and legal action.

6.14 Host families are strictly forbidden from undertaking any course of action (verbally or physically) that may lead to abuse, harm, neglect or exploitation of a student. If in doubt, refer to the training materials and guidance at Gateway and / or speak to the DSL.

6.15 Host families must refer to Gateway Acceptable Computer Use to familiarise themselves and understand what is and what is not permissible for students and ensure to discuss the same with the students.

6.16 In case of concern, Host families must follow the procedure to report the concern to the DSL at their earliest opportunity.

6.17 Host families will respond swiftly and appropriately to all suspicions or allegations of abuse.

6.18 Host families will ensure confidential information is restricted to the appropriate parties and will comply with the Data Security and Information Sharing Policy.

6.19 Host families shall review and adhere to this policy and the supporting document on procedures.

6.20 Host families must operate within the codes of conduct outlined within the various policies that support the work of Gateway.

6.21 Host families shall refresh their knowledge of this material at least annually.

6.22 Failure to comply with any of the requirements as set out in Gateway policies, or any behaviour that contravenes the terms of this policy and supporting procedures, will result in termination of agreement if the

matter is not resolved within 15 working days. And for the safety of the student, the student will be placed with another host family immediately until the matter is resolved.

STUDENTS

Legal Framework	The requirements below relate to Section 3 and 9 of the Children Act 1989, Keeping Children Safe in Education 2020 and the Data Protection Act 2018.
Responsible personnel	Admissions Officer, Accommodations Officer(s), Designated Safeguarding Lead (DSL), Parents and Students.

6.23 Gateway should ensure that any agency representing potential students meet the minimum requirements as set out by Gateway. This will be done by carrying out due diligence checks on the agency.

6.24 Gateway will appropriately review and store all application forms received from each student in the respective student folder online, which will have strict defined access rights. This should include assessment of the application by the Gateway Admissions Officer.

6.25 Gateway must have signed agreements with parents of all approved students and these are stored in the respective student folders online.

6.26 Gateway will share this policy and any accompanying documents, including child friendly versions of safeguarding information (within the student handbook) with the parents and students upon agreement of arrangement.

6.27 Students must comply with all Gateway guidance and advice to protect themselves from harm, abuse or exploitation.

6.28 In case of concern (for themselves or their peers), students must know how to persist in finding a trusted person on their chosen network and/or a SLO as quickly as possible to discuss the concern and to allow prevention or quick action as needed.

6.29 Students must comply with Gateway Code of Conduct for students, Acceptable Computer Use Statement for Students and Anti-Bullying Policy (students).

6.30 When online, students must bear the following guidance in mind to be safe online:
- Do not believe everything you read,
- Do not share personal data or photos with people you don't know
- Inform your host family adult, SLO, teacher, or Gateway DSL if you receive any unwanted contact online or via text or WeChat.

GATEWAY STAFF, SESSIONAL WORKERS AND VOLUNTEERS

Legal Framework	The requirements below relate to Sections 13 – 16 of Children Act 2004, Clauses 13, 16 – 19 of Working Together to Safeguard Children 2018, of Keeping Children Safe in Education 2020 Section 1 – 3, 7, 9 SVGA, and the Data Protection Act 2018.
Responsible personnel	All Gateway staff, sessional workers, volunteers

6.31 Gateway will ensure all legally responsible adults working with children, young people or adults at risk (referred to hereafter as "students") on its behalf, are appropriately vetted (see Sections 1-5 in Gateway Safeguarding Procedures) as follows:

- Are checked by the Disclosure and Barring service. These are renewed every 3 years or as agreed with management, and the certificates are not retained for longer than six months.
- Have a minimum of two appropriate references (one professional and one personal reference)
- Understand and accept their responsibility for the safety of students in their care.

6.32 Gateway will implement a clear safeguarding approach and framework consisting of:
- A trained DSL in position at all times without exception
- A trained Deputy to the DSL in position at all times to allow cover of the DSL if needed, such as when on leave

- Clear escalation and reporting guidelines as detailed in the Gateway Safeguarding Procedures document.

6.33   Gateway will implement clear role mandates for each position within the organisation, especially for those working directly with children. These must be reviewed at the start of the role, refreshed annually as required and made available online.

6.34   All Gateway staff, sessional workers, volunteers must undertake the induction safeguarding training, to be followed by essential Safeguarding online training, and you shall ensure that your team and colleagues (including host families) complete the same.

6.35   All Gateway staff, sessional workers, volunteers must undertake induction training on Gateway's safeguarding approach.They must review the Gateway Safeguarding Policy, Gateway Safeguarding Procedures, other Gateway policies as deemed relevant, Working Together to Safeguard Children 20202 and Keeping Children Safe in Education 2020. Gateway will regularly review understanding through team meetings and supervision.

6.36   All Gateway staff, temporary workers and volunteers shall ensure that students' welfare is of paramount importance, regardless of age, disability, racial heritage, religious belief, sexual orientation, or identity, when planning, organising, advising and delivering progrmames.

6.37   All Gateway staff, temporary workers and volunteers are strictly prohibited from engaging in any form of sexual activity with students. They are reminded that according to the Sexual Offences Act 2003, any person in a Position of Trust engaged in sexual activity of any sort with students under the age of 18 is breaking the law. This will result in dismissal and legal action. Any member of staff or volunteer who has knowledge (or reasonable concern) about another member of staff or volunteer partaking in any sexual activity or inappropriate realtions with a student, they must follow the procedures within the Safeguarding Whistleblowing Policy otherwise they could be seen as complicit in breaking the law.

6.38   All Gateway staff, temporary workers, volunteers are strictly forbidden from undertaking any course of action (verbally or physically) that may lead to abuse, harm or exploitation of a student. If in doubt, refer to the training materials and guidance at Gateway and / or speak to the DSL.

6.39   All Gateway staff, temporary workers, volunteers must refer to Gateway Acceptable Computer Use Statement for Students to familiarise yourself and understand what is and what is not permissible for students and ensure to discuss the same with the students.

6.40   All Gateway staff, temporary workers, volunteers must respond swiftly and appropriatetly to all suspicions or allegations of abuse, and to ensure confidential information is restricted to the appropriate external agencies.

6.41   All Gateway staff, temporary workers and volunteers shall refer to the Data Security and Information Sharing Policy for guidance on recording, storing and deleting the confidential information on all suspicions or allegations of abuse as noted by you.

6.42   All Gateway staff, temporary workers or volunteers shall raise awareness to relevant staff and stakeholders in the wider Gateway community of child protection issues through provision of training and updates to risk assessments.

6.43   If the role mandates, Gateway staff can directly engage with parents, however you must follow guidance provided to you by Gateway regarding this. Any safeguarding issues raised must be disclosed to the DSL first.

6.44   Accommodation Officer's must visit the host family at least annually during the students' stay to check on general conditions and wellbeing of the student in the household. Student Liaison Officer's (SLOs) can undertake ad hoc visits if required or they feel it is necessary to follow up a concern . SLOs must notify anything urgent to the DSL immediately, and if not urgent, should make notes from the visit to be stored in the respective student folder online.

6.45   SLOs must undertake a minimum of monthly visits to schools of the students they are responsible for, to check on students' wellbeing. Prior to their visit, SLOs must notify the school and ask for any feedback from staff on arrival (either a completed Gateway School Information form or, if they want to, the school staff may meet with the SLO to discuss any concerns). It is important that Gateway offer this opportunity for schools to regularly liaise. In the event the SLO is not able to undertake face to face visits due to circumstances such as a pandemic, the SLO's will make every effort to contact students remotely and provide support.

6.46 SLOs must communicate with parents, within an agreed time scale appropriate to the individual incident, regarding any safeguarding concerns or issues. This timescale is to be decided by DSL at the time.

6.47 Any behaviour by responsible adults working at/ with Gateway that contravenes the terms of policy and procedure may be considered for disciplinary action, which in turn may lead to dismissal or legal action.

Safeguarding Whistleblowing

6.48 Gateway's Safeguarding Whistleblowing approach is designed to cover concerns that staff have about the conduct of individuals in a position of trust within Gateway which could be detrimental to the safety or wellbeing of students and where staff, volunteers or temporary workers, for whatever reason, feel unable to raise them under the Safeguarding Policy and Procedures around dealing with such allegations.

6.49 Gateway will take appropriate action to protect the individual raising the concern when they are acting in good faith.

6.50 All concerns will be treated in confidence, however, there may be a need for the whistle blower to give evidence for example if they have witnessed a crime or in regard to disciplinary procedures if this is the outcome.

6.51 Gateway's approach encourages individuals who raise concerns to be identified in doing so as part of their professional role / responsibility. However, anonymous allegations will be investigated as thoroughly as possible.

6.52 If an individual raises a concern in good faith, which is not confirmed by an investigation, no action will be taken. However, if a concern is raised maliciously, disciplinary action may be taken.

6.53 To raise a concern under the Safeguarding Whistleblowing approach, an individual should contact the Designated Safeguaring Lead; a Whistleblowing template form can be found in Safeguarding Templates to record the concern, even if this was reported verbally. Details of how to submit this form are in the form guidance.

ESCALATIONS

Legal Framework	The requirements below relate to Keeping Children Safe in Education 2020 and the Data Protection Act 2018.
Responsible personnel	All responsible adults

6.54 All adults have the responsibility to escalate if he/she feels a concern has not been dealt with appropriately.

6.55 Gateway will maintain a log of all safeguarding issues which will be owned by the DSL. Templates of this log are available on One Drive under Safeguarding UK, Safeguarding Templates. Completed forms must have restricted access which is managed by the DSL (through the IT team).

6.56 Any safeguarding issues related to a student or a host family must not be noted in detail in their individual folder, such as the concern, disclosure or action. Access to the detailed information can only be granted by the Head of Operations or DSL on a case by case basis.

6.57 Refer to the Gateway Safeguarding Procedures document for guidance on managing disclosures and reporting.

6.58 All responsible adults must comply with the Data Security and Information Sharing Policy when it comes to issue resolution and closeout.

6.59 Gateway will share lessons learnt annually and as required within the organisation and with relevant external stakeholders if required. This will be based on previous cases and Serious Case Reviews;

however will not compromise on confidentiality and will be treated as a knowledge sharing activity. This can then be used to update staff training or guidance as required.

REPATRIATION

Legal Framework	The section below is based on good practice.
Responsible personnel	Accommodation Officer, Student Liaison Officers (SLOs), School Partnership Manager and Designated Safeguarding Lead (DSLs)

6.60   Gateway will implement a formal process for the Accommodation Officer to collect feedback from host families either verbally (which is then minuted) or via a feedback form (Annex 6 – Feedback Form_Host Family), which will be stored on record. The Accommodation Officer can raise any specific points of discussion to the wider team in team meetings.

6.61   Gateway will implement a formal process for SLOs to collect feedback from students either verbally (which is then minuted) or via a feedback form (Annex 7 – Feedback Form_Student), which will be stored on record. SLOs can raise any specific points of discussion to the wider team in team meetings.

6.62   The School Partnership Manager will send across a feedback form to be completed by schools at the end of the academic year. A meeting can be organised for any issues raised for further discussion. This will be recorded on respective school folders.

6.63   Where appropriate and in line with Data Protection Act 2018, Gateway will share with parents relevant information about their children during their time in the programme.

6.64   The feedback collected from students, host families and schools will be reviewed by the The management team and the relevant stakeholders, such as Student Liaison Officers or the Accommodation Officer.

6.65   Feedback which requires further consideration and action, such as if it raises a risk or concern, will be discussed at the team meetings and / or meetings with Management as required, and actioned as necessary. If urgent, this must be actioned immediately – such as immediate reporting of Safeguarding incident or addressing changes or updates to arrangements prior to starting a new activity or arrangement.

7. RESPONSIBILITIES

The implementation of this policy is mandatory across all areas and activities of Gateway. Specific responsibilities are outlined below:

7.1   The Director is ultimately responsible for the implementation of Gateway's Safeguarding policy and procedures.

7.2   The senior management team (SMT) must ensure the policy and its accompanying procedures and practice guidelines are implemented across their geographical and functional areas of responsibility.

7.3   The DSL will report to the Director on any safeguarding and/or child protection issues which have arisen, within the scope of confidentiality as described below. The DSL & DDSL are responsible for the following:

- Referring a child if there are concerns about a child's welfare, possible abuse or neglect to the Multi-Agency Safeguarding Hub (MASH) team, via telephone or email
- Ensuring that detailed and accurate written records of concerns about a child are kept even on the approved record keeping forms. If there is no need to make an immediate referral, these records will be kept until a young person turns 25.
- Ensuring that all such records are kept confidentially and securely and are separate to student's records, with a front sheet listing dates of brief entry to provide a chronology.
- Acting as a focal point for staff concerns and liaising with other agencies and professionals and ensuring that resource is available to support staff on safeguarding / child protection issues.
- Regularly reviewing safeguarding implications across the scope of work of Gateway and fully consider it in the development of all new pieces of work.
- Continue development and update of Gateway's approach to Safeguarding.
- Ensuring that all staff and host families are aware of Gateway's Safeguarding Policy and procedures and know how to recognise and refer any concerns.

- Regularly update their knowledge by keeping abreast of current Safeguarding issues both locally and nationally to enable them to fulfil their role, including attending relevant training, as directed by the Director.
- All staff members are responsible for promoting good practice and are trained as necessary.
- Ensuring there is consideration of Safeguarding in all appointments of staff, host families and any other individual, such as temporary workers, that work at / with Gateway
- Annually reviewing and updating the Safeguarding policies and procedures.
- Ensuring there is always a member of staff, such as the Deputy to the DSL, who will act in the DSL's absence, having also received child protection training and been briefed in the role and the above listed responsibilities.

7.4   The Guardianship Manager is responsible for:
- Ensuring all Student Liaison Officers are aware of their roles and responsibilities under this policy and that this forms part of their induction.
- Ensuring that Student Liaison Officers (SLOs) are able to discuss safeguarding, child protection and abuse issues confidentially but have an understanding of the importance that all concerns must be escalated to the DSL at the earliest opportunity.
- Ensuring SLOs receive guidance and support on action if situations arise (working with the DSL).
- Ensuring this Safeguarding Policy is fully implemented and that work with the DSL to ensure that procedures to support the policy are set up as outlined, complied with and communicated.
- Ensuring the referral of all safeguarding, child protection issues to the DSL (or to the Deputy to the DSL in the DSL's absence) and to follow up concern appropriately to ensure a satisfactory conclusion.

7.5   All students, children and young people and adults at risk (where a child is defined as a person under the age of 18₂ (The Children Act 1989)) are responsible for:
- Looking out for themselves and their peers
- Raising concerns with SLOs, host families or the Gateway DSL as necessary at the earliest opportunity.

8.   GATEWAY SUPPORTING POLICIES AND PROCEDURES

8.1 This policy should be read in conjunction with the following Gateway policies and procedures:

- Gateway Safeguarding Procedures
- Gateway Anti Bullying Policy,
- Gateway Prevent Policy
- Gateway Missing Child Policy
- Gateway Safer Recruitment Policy
- Gateway Whistleblowing Policy
- Gateway Host Family Health and Safety Policy
- Gateway Homestay Guidebook
- Gateway Safer Care Plan
- Gateway Student Code of Conduct
- Gateway Acceptable Computer Use Statement for Students
- Guidance and Advice to Hosts – Computer and Internet Usage
- Gateway Data Security and Information Sharing Policy.

For staff: These documents can be found in One Drive in the relevant folders for host families and guardianship: These documents are to be provided upon agreement of contract and by the Gateway Accommodation Officer or Guardianship Manager.

9.   REVIEW

9.1 This policy and the associated procedures must be reviewed and updated by Gateway to reflect any relevant changes in legislation, arrangements, approach or procedures. As a minimum, it must be reviewed annually by the Head of Operations and DSL, or following any relevant change in the business model, to ensure it is up to date and any amendments have been made as necessary, including collecting feedback from colleagues. Gateway will monitor and review the effectiveness of this policy on a regular basis and for all Gateway activities. The policy is owned by and will be signed off by the Head of Operations

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² Or 20 if the child is disabled or has been in local authority care at any time since the age of 16.

Annex 1 - Safeguarding Contacts List

Gateway Safeguarding Team	
Designated Safeguarding Lead: Katie Cross	Tel: 07961658899 Email: katie@gateway-education.com
Deputy Designated Safeguarding Leads:	
Michelle Codd	Tel: 07395797489 Email: michelle@gateway-education.com
Henry Xia	Tel: 07395797491 Email: h.xia@gateway-education.com
Emergency out of hours	Tel: 07587335292

Police	
Police non-emergency	101

Remember – in an emergency always dial   999

Northamptonshire Multi-Agency Safeguarding Hub

Telephone:	0300126 7000 (option 1)
Out of hours:	01604 626 938
Website:	http://www.northamptonshirescb.org.uk/worried-about-a-child-/

| NSPCC (National Society for the Prevention of Cruelty to Children)
A registered charity established to prevent cruelty to children. |
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Report a concern / Child protection helpline	Tel: 0808 800 5000
Email: help@nspcc.org.uk
Website:	www.nspcc.org.uk

| ChildLine
Free 24 Hr confidential helpline for children and young people |
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Telephone:	0800 11 11
Website:	www.childline.org.uk

| Kidscape
Advice for Parents and Children on keeping safe |
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Website:	www.kidscape.org.uk

| Children England
A registered charity created by other charities aimed at creating a society where all children and young people are valued, protected and listened to, their rights are realised and families are supported. |
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Website:	www.childrenengland.org.uk

Annex 2 – Threats to Children – Types of Abuse and Exploitation

Abuse is 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 another child or children. Children may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their day-to-day lives.

These threats can take a variety of different forms including those listed and defined below (using the definitions provided in Working Together to Safeguard Children 2018):

- **Sexual abuse**
- **Physical abuse**
- **Emotional abuse**
- **Neglect**
- Honour based abuse
- Child criminal exploitation
- Influences of extremism leading to radicalisation.
- Online abuse
- Sexual exploitation
- Trafficking

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 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.

Physical Abuse – 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 – persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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, though it may occur alone.

Neglect – persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

i.   provide adequate food, clothing and shelter (including exclusion from home or abandonment)
ii. protect a child from physical and emotional harm or danger
iii. ensure adequate supervision (including the use of inadequate caregivers)
iv. ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

'So-called Honour-based Abuse'– 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.

Child Criminal Exploitation – Where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity:

i.   in exchange for something the victim needs or wants, and/or
ii. for the financial or other advantage of the perpetrator or facilitator and/or
iii. through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology.

Sexual Exploitation – is a form of abuse where children are exploited for money, power or status. Often it will involve violent, humiliating and degrading sexual acts or assaults. Children can be forced into exchanging sexual activity for money, drugs, affection, gifts or status. Consent cannot be given even if the child is voluntarily engaging in the sexual activity with the person who is exploiting them. Child Sexual Exploitation does not always involve physical contact and can happen online. A huge number of children who are victim to sexual exploitation will go missing from care, home or education at some point. Below are some of the signs that could be an indication of sexual exploitation:

- Unexplained gifts or possessions
- Association with other young people involved with exploitation
- Have older boyfriends or girlfriends
- Suffer with STI (Sexually Transmitted Infections) or pregnancy

- Changes in emotional well being
- Drug and alcohol misuse
- Missing for periods of time or returning home late
- Regularly miss school or do not take part in any education

Influences of extremism leading to radicalisation – Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Calls for the death of members of armed forces are regarded as extremist. There is not a specific way of identifying a person who is likely to be susceptible to extremist ideology. It can happen in many different ways and settings. Background factors could contribute to the person's vulnerability which is often combined with influences such as family, friends or online exposure. The internet and the use of social media in particular has become a major factor in the radicalisation of a child. As with other risks we need to be alert of children's changes in behaviour whom may need help or protection. Please refer to Gateway's Prevent Policy and Procedure for further information.

OTHER FORMS OF ABUSE

Psychological abuse – includes emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Examples include not giving a vulnerable person opportunity 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 a vulnerable person, which may include interactions that are beyond a vulnerable person's developmental capability. It may involve serious bullying (including cyber bullying), or the exploitation or corruption of a vulnerable person.

Online abuse – Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones. Children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online).
Children can feel like there is no escape from online abuse – abusers can contact them at any time of the day or night, the abuse can come into safe places like their bedrooms, and images and videos can be stored and shared with other people.

Self-harm – Deliberate self-harm includes any intentional act of self-injury or self-poisoning, irrespective of the apparent motivation or intention. Self-harm is not usually about trying to get other people's attention. It often comes from feeling numb or empty, or wanting some relief. It might be linked to feeling depressed or anxious, low self-esteem, drug and alcohol abuse, relationship problem, bullying or worries about sexuality. The most common activities are cutting and overdosing although there are many other forms such as hitting, burning, pulling hair, picking or scratching skin, swallowing things that are not edible, inserting objects into the body, and banging the head or other body parts against walls. There are other activities such as eating disorders (Refer to Eating Disorder Guidance), drug and alcohol misuse and risk-taking behaviours.

Annex 3 – Safeguarding Responsibilities Structure

Key:
→ (orange) Mandatory step
→ (blue) Will not be relevant for all cases

PwC

Annex 4 – Schools Vetting for on-boarding
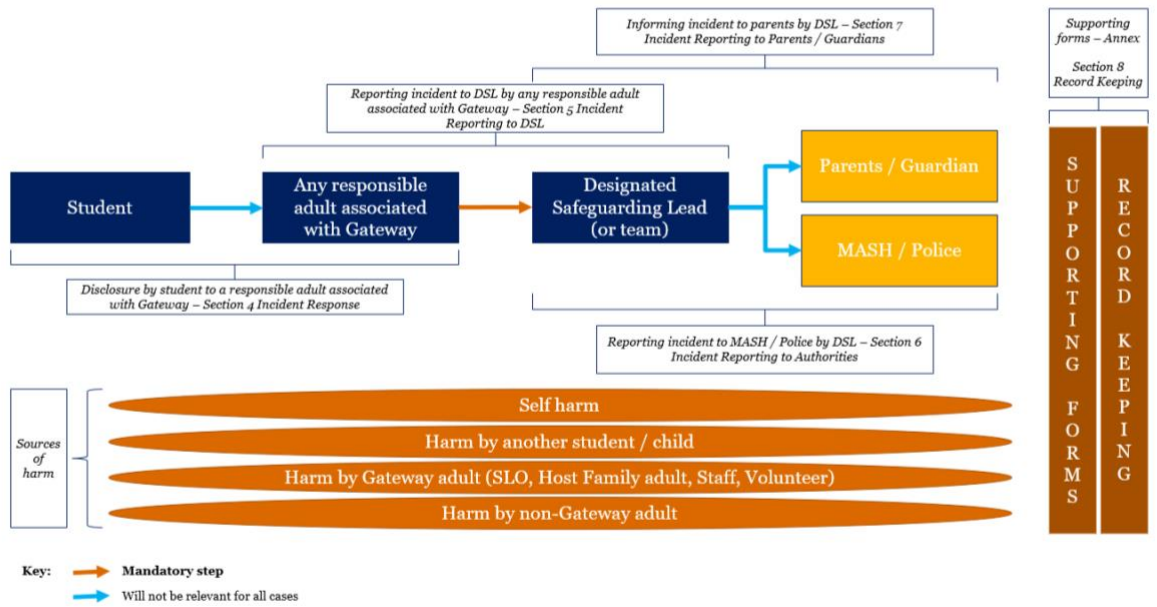
Schools Vetting for On-boarding

Action	Comments or areas of concern	Staff Initials	Date of completion
Safeguarding Polices: Check ALL policies and save them electronically. **Safeguarding Policy**			
Equality & Diversity Policy			
Peer-on-Peer Abuse policy			
Admissions Policy			
Behaviour Policy			
Bullying Policy			
Complaints Procedure			
First Aid Policy			
Health & Safety Policy			
Privacy Policy			
Designated Safeguarding Lead name and contacts			
Internet trawl of schools for non-compliance or headline news reports			
ISC Full Report Read and check report			
ISC Compliance Report Read and check compliance			
Confirmation of enhanced DBS checks on all staff working in the school			
Visit school to carry out tour and Health & Safety checks			
Agreed process for advising Gateway of any changes in safeguarding policy, procedures or team. Clear guidelines are in place between both parties regarding their safeguarding responsibility to students.			
Ensure all contractual agreements are in place			
Confirm annual tuition fees (pure tuition – no lunch – no extras)			

Annex 5 – Glossary[3]

[3] All definitions are in the context of Gateway UK's business

Allegation	Allegation refers to a claim or assertion that someone has been abused, harassed, bullied or exploited. This may come from a third party, such as another adult or child, rather than the victim themselves.
Child and adolescent mental health services (CAMHS)	CAMHS is used as a term for all services that work with children and young people who have difficulties with their emotional or behavioural wellbeing.
Concern	Concern refers to when an individual has a suspicion or doubt that someone has been or is being abused, harassed, bullied or exploited, and mainly refers to situations where an individual has identified reasons for concern, but no allegation or disclosure has been made.
Disclosure	Disclosure refers to when a student reveals that they have been or are being abused, harassed, bullied or exploited.
Disclosure and Barring Service	The Disclosure and Barring Service (DBS) is a non-departmental public body of the Home Office of the United Kingdom The DBS enables organisations in the public, private and voluntary sectors to make safer recruitment decisions by identifying candidates who may be unsuitable for certain work, especially that involving children or vulnerable adults, and provides wider access to criminal record information through its disclosure service for England and Wales.
DBS Check - Basic	A basic disclosure is the lowest level of criminal record check available. Due to differing legislation, this check is now issued by either the Disclosure and Barring Service for those working in England and Wales, or Disclosure Scotland for those working in Scotland. This check is available to anyone over the age of 16 and will detail any unspent (recent or serious) convictions the applicant has.
DBS Check - Standard	A standard DBS check is more comprehensive than a basic check, revealing a greater level of detail. A standard disclosure is available for posts involving regular contact with children (and vulnerable adults) amongst others. Standard disclosures indicate if there is nothing on record or show details drawn from the police national computer of: Spent and unspent convictions; Cautions; Formal reprimands; and Final warnings. Standard disclosures are issued to the individual and copied to the body registered to seek them.
DBS Check - Enhanced	An enhanced DBS check is the highest level of DBS check available and, like the standard DBS check, is only available to those who meet the eligibility criteria. The enhanced disclosure in addition to the information provided by a standard disclosure may contain non-conviction information from local police records, which a chief police officer thinks may be relevant to the position sought. The enhanced disclosure is available for positions involving regular caring for, training, supervision or being in sole charge of children (or vulnerable adults).
Local Authority Designated Officer (LADO)	Mainly referred to as Designated Officer or Designated Team of Officers now. A Local Authority Designated Officer (LADO) works within each Local Authority area and is there to support staff across all organisations who work with children and young people if any concerns arise regarding any practitioner who works with children and young people.
Local Safeguarding Children Boards (LSCBs)	The Local Safeguarding Board (LSCB) is the key statutory mechanism for agreeing how the relevant agencies in each local area will co-operate to safeguard and promote the welfare of children in that locality, and for ensuring the effectiveness of what they do.
Multi-Agency Safeguarding Hub (MASH)	MASH provides triage and multi-agency assessment of safeguarding concerns - in respect of vulnerable children and adults to 'join the dots' and understand threats so they can take action to prevent them. It brings together professionals from a range of agencies into an integrated multi-agency team. The MASH team share information from every agency. They make assessments and decisions, and the most appropriate intervention is agreed in response to the person's identified needs.
Ofsted	Office for Standards in Education, Children's Services and Skills. Reports directly to Parliament and is both independent and impartial. By law it must inspect schools with the aim of providing information to parents, to promote improvement and to hold schools to account.
ISI	Independent Schools Inspectorate. A government approved independent inspectorate for independent schools, quality assured on behalf of the Department for Education.
Partner schools	The schools that Gateway have assessed as suitable to partner with. Gateway UK's clients' children are then placed in these schools for a specific period of time for their education in the UK.
Private fostering	The arrangement in which a student aged under 16 (under 18 if disabled) stays with a family who is not his/her own immediate family for 28 days or more.
Safeguarding	The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully.
Safeguarding Incident	Any disclosure, allegation or concern related to abuse, harassment, bullying or exploitation is considered a safeguarding incident.

GATEWAY
EDUCATION

Host Feedback Form

We welcome all hosts to provide feedback to enable us to continue providing service as well as to improve on the service provided so any suggestions for its improvement will be greatly appreciated.

Gateway Education is interested in improving its provision to international students and host families. Here, we invite hosts to comment on what aspects of their experience they found went well, what has worked effectively, and if the support you received was sufficient and supportive. Your feedback will be carefully reviewed and if appropriate your comments will be used to formulate improvements in future updates.

Name:

....

Date:

....

Address:

....

....

....

....

1. **When a placement is arranged with you, how useful is the information we provide on the student(s)?**

....

....

2. Does the information on the students normally reach you in good time?

3. Are you ever inconvenienced by lack of communication of students?
     Yes (if so how, pleased comment below)   No   ◎

4. Do you feel there is enough communication between yourself and Gateway?

Excellent 12345   **Poor**

5. If you answered 4 or more, in your opinion how could this be improved?

6. Do our student placements ever cause you problems or serious inconveniences?

7. In case of emergency/problems, how easy do you find it to contact us for assistance?

Excellent 12345   **Poor**

8. If you answered 4 or more, in your opinion how could this be improved?

9. **Once an issue has been reported, how would you describe our support?**

....

....

....

10. **Do you feel that your requests for support on specific problems are adequately addressed by us?**

....

....

....

11. **Are you regularly paid for your services?**

    ⊙ Yes   No ⊙

12. **Do you ever experience delays in payments?**

    ⊙ Yes   No ⊙

13. **Have we ever failed to pay you for your services**

        ⊙ Yes   No ⊙

14. **In general, how satisfied are you with our support?**

....

....

....

15. **Would you recommend Gateway to friends/family?**

    Not likely 12345   **Very Likely**

16. **Please let us know if you have any further comments?**

....

....

....

....

GATEWAY
EDUCATION

Student Feedback Form (half term stays)

In order to maintain and improve our services, I am writing to ask you to complete a short homestay satisfaction survey which aims to help us find out more about your unique experiences from Gateway's host families. Your feedback and suggestions will be carefully considered and will help Gateway Education to improve our services accordingly. Your answers will be treated in the strictest confidence. The information and finding will be used by Gateway Education for internal use only.

1. Your Name

   _____

2. Your School

   _____

3. What's the name of your host family?

   _____

4. Did you enjoy staying with your host family?

	1	2	3	4	5	
No	◯	◯	◯	◯	◯	Very enjoyable

5. Did you feel comfortable and safe in your host family?

	1	2	3	4	5	
Uncomfortable and/or unsafe	◯	◯	◯	◯	◯	Very Comfortable and safe

6. If uncomfortable and/or unsafe, why?

_____

_____

_____

_____

_____

7. Were you satisfied with the facilities of your host family?

	1	2	3	4	5	
Unsatisfied	◯	◯	◯	◯	◯	Very satisfied

8. If unsatisfied, why?

_____

_____

_____

_____

9. Did you find the host approachable and supportive?

	1	2	3	4	5	
No	◯	◯	◯	◯	◯	Yes

10. Did you have much interaction with your host family?
i.e having meal together or invite you to family activities

	1	2	3	4	5	
No	◯	◯	◯	◯	◯	Yes

11   If no, why?

o

_____
_____
_____
_____
_____

12   _____

o   Did you like the food provided by your host family?

                    1   2   3   4   5
                   ◯   ◯   ◯   ◯   ◯
         No   Yes

13   If no, did you feel you can discuss with your host family?

o

         ☐ Yes
         ☐ No
            ☐ _____

14   Where did you spend most of your time?

o   ☐ Your room
        ☐ In common area alone
        ☐ In common area interacting with host family

15   If you spend most of your time in your room, why?

o
        ☐ Host family are not available or approachable
        ☐ I like to be on my own :
            _____

16   What positive or negative feedback would you like to tell us?

o

SCHOOLS FEEDBACK FORM

We welcome all Schools to provide feedback to enable us to continue providing a quality service as well as to improve on the service provided so any suggestions for its improvement would be greatly appreciated.

Gateway Education is interested in continually developing its service and provision to international students and schools. Here we invite Schools to comment on what aspects of their experience they found went well, what has worked effectively and if the support you received was sufficient and supportive. Your feedback will be carefully reviewed and if appropriate your comments will be used to formulate improvements in future updates.

SCHOOL NAME:

NAME AND POSITION OF THE PERSON COMPLETING THE FORM:

DATE:

	Yes	No	Additional Comments/Suggestions
ADMISSIONS			
Does your School have a good working relationship with our Admissions Team?			
Does the Admissions Team respond to all correspondence in a timely manner?			
Is the information the Admissions Team send to your school accurate, and correct?			
Do you find the Admissions Team knowledgeable and able to answer any queries you have?			
GUARDIANSHIP SERVICE			
Does your School have a good working relationship with our Guardianship Team?			
Does your School find it easy to access members of our Guardianship Team?			
Does our Guardianship Team respond to all correspondence in a timely manner?			

Do you find the Guardianship Team knowledgeable and able to answer any questions or queries you have?			
Do you feel the school and students receive sufficient support from our guardianship service?			
SAFEGUARDING			
Is your School aware or know the members of our Safeguarding Team?			
Do you feel confident you know who to contact and to contact us if you have a Safeguarding concern?			
If you have had communication with our Safeguarding Team, have you found them to respond to you in a timely manner?			
Do you find the Safeguarding Team knowledgeable and able to deal with any Safeguarding issues and concerns?			
Do you hold a copy of our Safeguarding Policy on your files?			
SCHOOLS PARTNERSHIP/LIAISON			
Does your School have a good working relationship with our Schools Partnership Manager?			
Does your School find it easy to access our Schools Partnership Manager?			
Has the Schools Partnership Manager visited your School?			
If the answer to the above question is no, would you like the Schools Partnership Manager to arrange a visit your School?			
PLEASE USE THE SPACE BELOW TO MAKE ANY ADDITIONAL COMMENTS:			

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