



Child Protection Policy

Key Elements

This document sets out the responsibilities and expectations for all families of London International Agency in relation to safeguarding and promoting the wellbeing of children and young people at London International Agency

Implementation is monitored by the Director and supported by the Guardianship Organisation with responsibility for Safeguarding

Adopted on:
January 2018
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Agreed by:
London
International
Agency (LIA)

Due for Review:
March 2024

The Director of London International Agency (LIA) wishes to make it clear that extremist religious views and partisan political views will not be tolerated.

All families are expected to offer a balanced presentation of views and opinion to children while they are in the care of these families, in attendance at schools and while taking part in extra-curricular activities that are provided or organised by or on behalf of the families or LIA including through the distribution of promotional materials.

Failure to observe the above could lead to procedures including instant removal of the child, cessation of contract without refund and referral to government and education authorities.

London International Agency is committed to protecting the health, safety and welfare of our employees. It is our policy to ensure, as far as is reasonably practicable, that all required tasks and activities are carried out with the minimum of risk to our employees, people in our care and others.

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1. Introduction

Safeguarding is the action we take to promote the welfare of children and protect them from harm. It means caring for children appropriately and protecting them from that which is not in their best interests; as such, it includes health and safety, child protection and pastoral care. Connected to safeguarding is the phrase ‘Duty of Care’; there is a legal responsibility that adults who work with children as professionals or volunteers have a duty to look after them properly; children depend on adults for their safety and well-being.

LIA acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and regulatory requirements. The policy recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socioeconomic background, all people are equally regarded.

LIA will fulfil our local and national responsibilities as laid out in the following documents:-

- The Procedures of Borough of Windsor and Maidenhead Safeguarding Children Board (Jan 2018)
- Keeping Children Safe in Education: Statutory guidance for schools and colleges (DfE Sept 2018)
- The General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)
- Working Together to Safeguard Children (DfE 2015)
- Mental Health and Behaviour in Schools: Departmental Advice (DfE 2014)
- The Education Act 2002 s175 / s157
- The Prevent Duty (March 2016) as part of the Counter-Terrorism and Security Act (2015)

2. Application of this Policy

This policy and procedures are widely promoted and are mandatory for everyone involved in LIA: for LIA staff, homestay hosts and their families, LIA Guardianship children and their parents and anyone else who comes into contact with an LIA Guardianship child. It details what LIA thinks about safeguarding, and what we do to keep children safe.

LIA is committed to safeguarding the welfare of every Guardianship child in its care and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after under 18s safely.

It is essential that the LIA Safeguarding Policy and Guidance is known to all adults in the homestay host's household, so homestay hosts must take time to share this with all members of their household aged 16+.

Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

3. Policy Aims

- To provide protection for the children and young people who receive LIA services, including the children of our homestay hosts via the child code of conduct.
- To provide LIA staff, homestay hosts and their families with guidance on procedures they should adopt in the event that they suspect a child or young person may be experiencing, or be at risk of, harm.

4. LIA Safeguarding Principles

We will seek to safeguard children and young people by:

- valuing, listening to and respecting them;
- adopting child protection guidelines through procedures and a code of conduct for staff, homestay hosts and their families;
- promoting and prioritising the safety and wellbeing of children and young people;
- recruiting staff and homestay hosts safely, ensuring all necessary checks are made, preventing the employment/deployment of unsuitable individuals;
- sharing information about child protection and good practice with LIA Guardianship children, parents, staff, homestay hosts and their families;
- sharing information about concerns with agencies who need to know, and involving parents and children appropriately;
- providing effective management for LIA staff and homestay hosts through supervision, support and training;
- providing a safe and secure environment for all children;
- ensuring all children are safe and secure and protected from harm;
- ensuring that all LIA Guardianship children know who to turn to for help, advice or support, and have access to 24 hour support;
- appointing a Designated Safeguarding Lead who has overall responsibility for the safeguarding and welfare of all LIA Guardianship children;
- ensuring that everyone understands their roles and responsibilities in respect of

safeguarding and is provided with appropriate training to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people;

- ensuring that all staff and homestay hosts follow LIA policies and procedures relating to safeguarding and welfare and are aware of who in LIA is responsible for safeguarding;
- ensuring that the relevant persons are aware of the special needs or particular vulnerabilities of individual LIA Guardianship children;
- ensuring appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern;
- ensuring that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored;
- the guardianship organisation will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide;
- all staff and homestays should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child;
- It is important that staff and homestays determine how best to build trusted relationships with children and young people which facilitate communication.

5. LIA staff roles and responsibilities

Within LIA, the Principal looks after day to day welfare and safeguarding matters, placement of LIA Guardianship children with homestay hosts, induction and recording systems. **The Principal and Designated Safeguarding Lead (DSL), Krestyna Huggins is trained in Child Protection to Level 3.**

6. LIA Child Protection Policy and Procedure

LIA's Child Protection Policy and Procedure

Creation Date	Review Date	Version	Director
08/2018	April 2023	2018.08 (1.3)	Krestyna Huggins

Introduction

London International Agency is committed to safeguarding the welfare of LIA Guardianship

children and has developed this Child Protection Policy and Procedure to support homestay hosts and staff members in putting into practice this commitment.

This policy establishes the roles and responsibilities of everyone who works for London International Agency in relation to the protection of children and young people with whom their work brings them into contact. In the context of child protection, children and young people refers to anyone under 18 years of age. It is the responsibility of everyone at Living Learning English to promote the protection of children and young people. In following this policy, staff are always expected to maintain a sense of proportion, apply common sense to situations and protect the child's welfare as priority.

This policy is based on, and reflects, the principles of both UK legislation and guidance and other relevant LIA policies and procedures. The approach has been developed in such a way as to be consistent with 'Best Practice' within the field of child protection.

The welfare of the child or young person is the paramount consideration. All children and young people, regardless of age, disability, gender, racial or ethnic origin, religious belief and sexual identity have a right to protection from harm or abuse.

It is also the duty of London International Agency to ensure that persons are not placed in situations where abuse might be alleged. It is not intended that the policy should restrict staff from normal ways of working, but Homestay Hosts and Members of Staff always need to consider how an action or activity may be perceived as opposed to how it is intended.

Principles of Good Practice

London International Agency undertakes to:

- treat children and young people with care, respect and dignity
- recognise that those working for LIA will be perceived by children and young people as trusted representatives of London International Agency
- ensure communication with children and young people is open and clear
- assess the risks to children of its activities

Krestyna Huggins (Principal) is the designated Child Protection Officer and has responsibility for implementing the LIA Child Protection Policy. Appropriate training has been undertaken. The Child Protection Officer is responsible for reporting any allegations of child abuse that occur.

Aims

- LIA considers it the duty of Homestay Hosts and Members of Staff to protect children and young people who they come into contact with from abuse. This is part of our safeguarding children procedure.
- All homestay hosts and adults in the homestay household must understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated senior person responsible for child protection.
- All homestay hosts and adults in the homestay household must understand the responsibility placed on LIA for child protection.
- Not all concerns about children or young people relate to abuse, there may well be other explanations. It is important to keep an open mind and consider what you know about the child and their circumstances.
- If you are worried, it is not your responsibility to investigate and decide if it is abuse. It is your responsibility to act on your concerns and do something about it.

Definition of Abuse

The 1989 Children Act recognises four categories of abuse:

- **Physical Abuse** – actual or likely physical injury to a child, or failure to prevent physical injury
- **Sexual Abuse** – actual or likely sexual exploitation of a child or adolescent. The child may be dependent or developmentally immature
- **Emotional Abuse** – severe or persistent emotional ill treatment or rejection likely to cause adverse effect on the emotional and behavioural development of a child. All abuse involves some emotional ill treatment
- **Neglect** – the persistent or severe neglect of a child, or the failure to protect a child from exposure to any kind of danger, resulting in the significant impairment of a child's health or development, including non- organic failure to thrive

Historical Abuse

There may be occasions when a child will disclose abuse (either sexual or physical) which occurred in the past. This information needs to be treated in exactly the same way as a disclosure of current child abuse. The reason for this is that the abuser may still represent a risk to children now.

Confidentiality and Appropriate Disclosure of Information

Records of Concern and Incident Reports must be used as detailed in their protocols. Confidentiality is crucial to all our relationships, but the welfare of the child is paramount. The law does not allow anyone to keep concerns relating to abuse to themselves. Therefore, confidentiality may not be maintained if the withholding of information will prejudice the welfare of the child.

All information that has been collected on any child will be kept locked and secure and access will be limited to the appropriate staff, management and relevant agencies.

In the event of an investigation, it is essential that no information on child protection concerns relating to a child are disclosed inappropriately. Any such leaks could have serious consequences for both the child concerned and any investigation.

Whilst parents / carers have the right to see any records kept on their child, this might not always be appropriate, and should not put the child or yourself at risk.

It is very important that only those who need to know (the designated Safeguarding lead at LIA), actually know, to avoid rumour and gossip that could affect the child or parent/carer.

Recognising Abuse

Recognising abuse is one of the first steps in protecting children and young people. There could be signs or behaviour that make you feel concerned. All Homestay Hosts and Members of Staff should be alert to the following types of behaviour in the children:

- becoming excessively aggressive, withdrawn or clingy
- seeming to be keeping a secret
- personality changes – becoming insecure
- unreasonable fear of certain people or places
- acting out in an inappropriate way perhaps with adults, other children, toys or objects
- inconsistent explanations of bruising, injuries or burns
- sexually explicit language or actions

Child Sexual Exploitation (CSE)

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

Some of the following signs may be indicators of 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 don't take part in education.

Female Genital Mutilation (FGM)

FGM is illegal in the UK and there is a legal duty to report if you know it has happened to an under 18.

What to do if a child makes a disclosure

LIA is committed to ensuring that it meets its responsibilities in respect of child protection by treating any allegation seriously and sensitively. Records of Concern and Incident Reports must be used as detailed in their protocols.

Follow the Safeguarding 5 Step Flowchart to support your response.

- Stay calm.
- Listen to what the child/young person is actually saying.
- Reassure them that they have done the right thing by telling you.
- Do not promise the child that this can be kept secret, as subsequent disclosure could then lead to the child feeling betrayed. Explain that you are obliged to inform other people.
- Reassure the child that the people who will be informed will be sensitive to their needs and will be looking to help protect them. Inform them that it is not in their interests to keep the disclosure confidential and it will have to be passed on to the appropriate agencies.

- Make a note of any conversations with the child, trying to make these as detailed as possible, including when and where the conversations took place. Draw a diagram, if appropriate, to show the position of any bruises or marks the child or young person shows you, trying to indicate the size, shape and colour.
- Record as soon as possible and use the **actual words** used by the child.
- Keep all records factual. Be aware of not making assumptions or interpretations of what the child/young person is telling you. Store all records securely.
- **Do not interrogate** the child, or push for more information. Ensure that any questions asked are open, not leading closed questions. Do not ask the child/young person to repeat what they have they told you, for another person. Record accurately.
- Discuss your concerns with the LIA Designated Safeguarding Lead (Krestyna Huggins) who will report this information to an appropriate agency (the Designated Officer previously called the Local Authority Designated Officer - LADO).
- The person to whom the disclosure was made should ensure that the child who has disclosed the information is informed about what will happen next, so they can be reassured about what to expect.
- You may report your concerns directly to your local LADO if you are not satisfied with the response from LIA. You will find contact details for your local Children's Social Care Referral and Assessment Team online. The details will be on your Local Council website.

Allegations against under 18s

Under 18s facing an accusation of child abuse will need additional support, especially as their parents will be overseas.

What to do if Abuse is Suspected

- The Homestay Host or Member of Staff should keep monitoring the child's behaviour, making a note of any particular concerns (when, where and what happened).
- Discuss concerns with the London International Agency Child Protection Officer.
- You should remember that if abuse is taking place, it is often not the parents but other family members or friends who are causing it. Parents are often the last to know.
- Any member of staff can contact the relevant agency to discuss any concerns they have and seek guidance before actually reporting any child protection issues. It is

appropriate to seek support from the LIA Child Protection Officer, as to how to deal with situations and confirm appropriate action to take.

- If you are still concerned about the welfare of the child/young person, this information must be passed on to the appropriate agency. It is important to remember that if you report concerns, you are not reporting the parents/carers – you are reporting to protect the welfare of the child.
- If appropriate, inform parents/carers that you are going to report your suspicions or concerns. This might not always be possible and should not put the child or yourself at risk. When you report an incident, the duty officer will ask you if the parent/carer has been informed. If they haven't, they will want to know the reasons why.
- If your Local Children's Social Care Referral and Assessment Team (Social Services) has been contacted, they should let you know that they are responding to what you have told them. It is unlikely that you will be told what action has been taken unless it has implications for the scheme. If you have not heard from the Referral and Assessment Team, it may be appropriate to contact them to ensure that the details you gave them have been taken into consideration and acted upon.

If You Suspect a Homestay Host, Person within the Host Family or Member of LIA Staff of Abuse or Inappropriate Behaviour

If it appears that any of the above has:

- behaved in a way that has harmed a child, or may have harmed a child, or
- possibly committed a criminal offence against or related to a child, or
- behaved in an inappropriate way towards a child which may indicate that he or she is unsuitable to work with children then these procedures must be followed:
 - ☐ record your concerns and report them to the Principal
 - ☐ the Principal will take steps to ensure that particular person is not left in sole charge of any child
 - ☐ the LIA Child Protection Officer will contact the Local Authority Designated Officer (LADO) to ask for advice and how to proceed and to give details of the concern
 - ☐ LIA will then follow the LADO's advice on how to deal with allegations against staff
 - ☐ while support will be offered to the staff member involved, LIA staff will ensure that the

- agencies concerned are given all assistance in pursuing any investigation

Support to Homestay hosts and Staff

LIA will fully support all Homestay Hosts and Members of Staff in following this procedure. Following an allegation or investigation, Homestay Hosts and Members of Staff can talk to the Child Protection Officer and any of the appropriate agencies detailed on p.24 of this Policy.

Recruitment of Homestay hosts and Staff

We acknowledge that paedophiles and those that pose a threat to children may be attracted to employment that allows them access to children and young people. As part of the LIA Safeguarding Policy, we will ensure that people working with the children are safe to do so. Our safe recruitment procedures are detailed in SP5 – Safer Recruitment Policy and Procedure.

Obligation to Report

LIA must refer details to the Disclosure and Barring Service (DBS) when an alleged person has resigned or they have been dismissed because they have harmed or could harm children or vulnerable adults. The information must be referred to the DBS as soon as it becomes known.

Implementation and Monitoring

- LIA will appoint a person with responsibility for child protection.
- This person will receive reports from Homestay hosts or Staff of any occasions when there are concerns or issues of Child Protection. These reports will be filed and kept securely by the designated CPO for 5 years. Only the CPO and YL Course Manager will have access to these records.
- LIA will review this policy annually to ensure it is being implemented. Appropriate action will be taken if deemed necessary, through consultation with the agencies referred to below.

Further Information

For information about all aspects of Child Protection, including more advice on what to do if you are worried about a child, visit: www.nspcc.org.uk (National Association for the Prevention of Cruelty to Children). They provide a free 24 hour helpline where you can discuss your concerns with a counsellor. You

can call the NSPCC on 0808 800 5000 or email: help@nspcc.org.uk

YOUR SAFEGUARDING / CHILD PROTECTION CONTACTS

1. LIA Child Protection Officer / Designated Safeguarding Lead

The London International Agency person responsible for child protection is:

Name: Krestyna Huggins

Position: Principal

Mobile: 07795 107532

You should call the LIA Child Protection Officer / Designated Safeguarding Lead FIRST to report an issue.

2. Referral Agencies

If you think a child is in **immediate danger**: contact the police by calling **999**

Otherwise, **call 101** & ask for the **Safeguarding Coordination Unit**.

3. Support and advice

- National Association for the Prevention of Cruelty to Children (NSPCC). Tel: 0800 800 500
- Childline (provides help and advice for children and young people). Tel: 0800 1111

7. Implementing the LIA Safeguarding Policy

Training and awareness

- LIA homestay hosts are trained in face-to-face discussions as part of their induction training at the initial and repeat home visits;
- LIA homestay hosts are regularly given training as necessary to update their knowledge of safeguarding and compliance to regulations.

Induction

- New LIA staff and homestay hosts have safeguarding procedures and their responsibilities included in their induction before they start to have contact with children.

Monitoring and supervision

- LIA actively monitors the use and application of the procedures. LIA homestay hosts are also asked about safeguarding issues and awareness when discussing their progress and reviewing their work.

Recording and information sharing

- Accurate records are kept within the guidelines of our procedures.

Policy Monitoring and Review

The policy will be reviewed a year after development and then every year, or in the following circumstances:

- changes in legislation and/or government guidance
- as required by the Local Safeguarding Children Board
- as a result of any other significant change or event

LIA's Code of Conduct for Homestay Hosts

Creation Date	Review Date	Version	Director
08/2018	April 2023	2018.08 (1.3)	Krestyna Huggins

It is important to build trust between under 18s and adults and to create a safe homestay environment through being positive and using praise. LIA homestay hosts are expected to promote positive behaviour in LIA Guardianship child and to be fair and transparent in dealing with under 18s. They should ensure that their conduct does not pose any risk to the safeguarding or welfare of children, their behaviour would be acceptable to the LIA Head Office or parents and they should ensure all adults who come into contact with LIA Guardianship children are excellent role models.

LIA's code of conduct for homestay hosts is designed to protect both adults and under 18s from any behaviour/ actions which might be misconstrued and it reflects the child-centred principles of the school.

The following code of conduct is extracted from the LIA Homestay Host Service Agreement signed by all homestay hosts accepting LIA Guardianship children.

Schedule 1: Code of conduct for homestay hosts

Introduction

1 Allegations of unprofessional conduct or improper contact or words can arise at any time. You are reminded that professionalism and vigilance are required, so as to ensure the

safety of children in your care, and to reduce the risk of an allegation of impropriety against you or a member of staff.

2 You need to take particular care when dealing with a child who:

2.1 appears to be emotionally distressed, or generally vulnerable and / or who is seeking expressions of affection

2.2 appears to hold a grudge

2.3 acts in a sexually provocative way, or who is inclined to make exaggerated claims about himself or herself and others, or to fantasies, or one whose manner with adults is over-familiar

Note: You must immediately inform the LIA if any child's behaviour is unusual or causes concern. Some of these behaviours may be indications that a child has been, or is currently being, abused and should therefore be reported to the Designated Person under LIA's Child Protection Procedures.

3 Always act within the spirit of these guidelines.

One-to-one contact with LIA Guardianship Children

4 When accommodating an LIA Guardianship child, you should take particular care in the following ways:

4.1 avoid sitting or standing in close proximity to the child;

4.2 avoid idle discussion;

4.3 avoid all unnecessary physical contact and apologise straight away if there is accidental physical contact;

4.4 avoid carrying out personal tasks which the child can do themselves, e.g. applying sunscreen;

4.5 avoid any conduct that could be taken as a sexual advance;

4.6 avoid words or expressions that have any unnecessary sexual innuendo; avoid displays of affection either personally or in writing;

4.7 avoid any form of aggressive contact such as holding, pushing, pulling or hitting,

which could amount to a criminal assault, or threatening words;

- 4.8 avoid any words or actions that are over-familiar;
- 4.9 do not swear, blaspheme or use any sort of offensive language in front of children;
- 4.10 report any incident that causes you concern to the Designated Person, and make a written record (dated and signed).

Physical contact

- 5. If you are at all concerned about anything which has occurred during the child's stay, inform the Principal without delay, and make a written record.
- 6. Touching may also be appropriate where a child is in distress and needs comforting. You should use your own professional judgement when you feel a child needs this kind of support and should be aware of any special circumstances related to the child. For example, a child who has been abused may find physical contact particularly difficult. You should ask permission to touch a child and explain what you are doing and, if possible, ensure the presence of another adult.

General information about the law for homestay hosts of under 18s

- 7. It is a criminal offence under the Sexual Offences Act 2003 for a person aged 18 or over who is in a position of trust in relation to another person under that age to engage in sexual activity with that person. The offence is punishable by up to six months imprisonment and/or an unlimited fine.
- 8. The Sexual Offences Act 2003 also introduced the offence of "meeting a child following sexual grooming". This applies where an adult arranges to meet a child aged under 16 in any part of the world, if he has met or communicated with that child on at least two earlier occasions and intends to commit a sexual offence against that child. The law is clearly intended to apply where adults contact children through the internet or by texting. However, the prior meetings or communications need not have an explicitly sexual content.
- 9. Most sexual activity involving a person under the age of 16 (male or female) is an indecent assault which is both a criminal offence and a matter for which damages can be awarded. This is so, even when the younger person is alleged to have provoked or encouraged the activity.
- 10. Every complaint by a child must be taken seriously and investigated. It may be necessary to involve social services who may themselves involve the police if there are grounds for thinking that a criminal offence has been committed.

Professionalism

11. LIA expects the highest standards of professional conduct at all times:

11.1 Dress appropriately to reflect your professional status and the fact that you are living with young people. In particular, avoid wearing nightwear in the child's company.

11.2 Ensure that the child's privacy is protected at all times including in their bedroom and when using the bathroom.

11.3 Always be mindful of the responsibility you have regarding alcohol and smoking whilst living and working with under 18s; avoid smoking and minimise alcohol consumption in the child's company.

11.4 Comply with UK laws regarding alcohol, drugs and smoking.

LIA's Code of Conduct for LIA Guardianship Children

Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

LIA promotes a safe, respectful and cooperative environment for all members of its community. As such, LIA Guardianship Children are expected to abide by its code of conduct.

Positive behaviour is expected of all LIA Guardianship Children in the homestay host's home. This is encouraged through homestay guidelines and rules for LIA Guardianship Children, adults

setting the right examples and having clear systems for responding to situations.

LIA Guardianship Children should:

- treat their homestay host, their families and other children courteously and with respect at all times
- treat all resources and facilities in the homestay host's home with respect

- follow appropriate instructions given by their homestay hosts or LIA staff
- be honest
- avoid the use of offensive language
- dress appropriately for the homestay environment and on any excursions, visits and activities

The home

LIA Guardianship Child's should:

- follow all rules set by their homestay host in addition to behaving in a courteous, respectful and cooperative manner at all times
- leave their bedroom and any facilities used in the home clean and tidy after use.
- be respectful of the family by being quiet at night
- respect the privacy of the homestay host and family and not enter any private areas of the house without their permission
- if given parental permission to go out unaccompanied, give an approximate time they will be home, and inform the homestay host if they will be late
- remain contactable by mobile phone at all times

Health and safety in the home

LIA Guardianship Children should:

- provide details in English to LIA of any medication they are taking and/or have with them in the homestay host's home
- use equipment in the home safely and in accordance with safety instructions given to them by their homestay host
- tell their homestay host about any accidents or safety-related incidents
- tell their homestay host if they are injured or feeling unwell
- follow all fire and other home safety advice given to them by their homestay host, in their LIA Guardianship Child Handbook and in the Home File

Excursions and visits (see also the LIA Excursions Policy and Procedure)

LIA Guardianship Children should:

- pay attention to and follow welfare, health and safety instructions given by their homestay hosts
- always carry a fully charged mobile phone which is switched on
- always carry their mobile phone with the LIA emergency contact numbers stored in the phone

- behave in an appropriate manner

Discrimination

Discrimination in any form will not be tolerated at LIA.

LIA Guardianship Children should behave in a way that has a positive effect on others and not discriminatory on any grounds, including age, gender, race, nationality, culture, religion, pregnancy and maternity, sexuality, disability, health, ability, status and appearance.

Bullying and harassment (see also the LIA Bullying Policy and Procedure)

Bullying (including cyberbullying), and harassment in any form will not be tolerated.

Use of the Internet and mobile electronic devices (see also the LIA E-Safety Policy)

LIA Guardianship Children under 18 years will be informed that network and internet use on a homestay host's computer will be monitored.

LIA Guardianship Children should:

- follow the guidance in the LIA E-safety policy
- be vigilant about their safety when using the internet and, specifically, not provide personal details, contact information or images to, or arrange to meet, people unknown to them
- not photograph or video fellow LIA Guardianship Children or LIA homestay hosts and their families without their consent
- not post images of LIA Guardianship Children or LIA homestay hosts and their families on the internet without permission
- not access illegal material
- not download any file to the homestay host's computer without permission
- not change the settings on the homestay host's computer without permission

Alcohol and illegal substances

LIA Guardianship Children should not:

- store, consume or be under the influence of alcohol in the homestay host's home if they are under the age of 18 years old
- purchase or consume alcohol in a public place or in licenced premises if under the age of 18 years
- purchase alcohol for anyone else
- store, solicit, purchase or use illegal substances at any time

Smoking

LIA Guardianship Children should not:

- smoke anywhere in the homestay host's home unless explicitly permitted to do so
- purchase tobacco products if under the age of 18 years

Criminal Activity

Criminal activity in any form will not be tolerated at LIA.

Intimidation, aggression and violence

Intimidation, aggression and violence in any form will not be tolerated at LIA.

Any children breaking British law, or persisting in serious anti-social behaviour, will be disciplined. In serious cases, LIA Guardianship Children may be asked to leave the LIA Guardianship Scheme.

LIA's Policy on Dealing with Unacceptable Behaviour in LIA Guardianship Children

Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

Breaches of the code of conduct for LIA Guardianship Children

It is the responsibility of LIA to ensure that all LIA Guardianship Children are informed of the LIA code of conduct and to confirm with them that they have seen, understood and agreed to follow it. LIA Guardianship Children must also be made aware of the consequences if they breach the code.

Behavioural misconduct is defined as any breach of LIA rules as described in the LIA Code of Conduct for LIA Guardianship Children. In addition, a breach of any rules that have been clearly and explicitly set out by homestay hosts will be considered behavioural misconduct.

LIA has clear procedures to help and support homestay hosts managing behavioural misconduct from LIA Guardianship Children within the home, and then with the help and support of LIA Guardianship Managers and the Principal.

Any children breaking British law, or persisting in serious anti-social behaviour, will

be reported and disciplined. Serious cases of gross misconduct will be referred immediately to the Principal and children may be sent home at their own expense, with no refund of fees and the LIA Guardianship Services cancelled.

Recording behavioural incidents: all incidents should be recorded on the LIA Incident Report Form and sent to the Guardianship Manager. These forms will be stored confidentially in the child record.

Managing behavioural incidents: early disciplinary procedures will be managed by the homestay host, depending on the nature of the incident. Later stage procedures will be managed by more senior members of LIA staff, using the procedures below.

Type of incident	Initial Procedure	Managed By	Subsequent Actions
Isolated case of minor behavioural incident	May be managed informally with child at the time of the behavioural incident. If an LIA Guardianship Child breaches the LIA code of behaviour, the most appropriate sanction for a minor or first-time breach will be to remind them about the code of conduct, and to ask them to comply with it. LIA Guardianship Children will be given the opportunity to reflect, enabling them to plan a positive response, with support from their homestay host.	Homestay Host	Monitor for further issues
1st behavioural incident	Stage 1: Verbal Warning If, having followed the above step, the LIA Guardianship Child continues to exhibit inappropriate or unacceptable behaviour, they should be referred to the LIA Guardianship Manager who will give them a formal, verbal warning. Supportive interventions may need to be identified at this stage. The action shall also be recorded on the behavioural incident report form and parents/carers informed.	Homestay Host LIA GM informed	Move through stages 2-4 if unresolved
2nd behavioural incident	Stage 2: Written warning Any further persistent inappropriate or unacceptable behaviour will result in a more serious sanction being imposed (eg restriction from family activities) and a written warning from LIA. Again, supportive interventions may need to be identified at this stage. This action should also be recorded on the behavioural incident report form and parents/carers informed.	Homestay Host and LIA GM	Move through stages 3-4 if unresolved
3rd behavioural incident	Stage 3: Incident Meeting with all Parties	LIA GM	Move to stage 4 if unresolved
4th behavioural incident	Stage 4 If these interventions are still not effective in helping the LIA Guardianship Child to change their behaviour, further sanctions	LIA GM Principal	Possible request to terminate LIA Guardianship

	will be necessary. It may be that at this point, LIA will discuss with the child and their family possible termination of LIA Guardianship Services	informed	Services
1 st serious incident	Stage 2/3 (depending on incident)	LIA GM Principal informed	Move through stages 3-4 if unresolved
2 nd serious incident	Stage 4	LIA GM and Principal	Request to terminate LIA Guardianship Services
1 st incident of gross misconduct	Stage 4	LIA GM and Principal	Request to terminate LIA Guardianship Services

The procedures outlined below should be followed sequentially but may not be initiated at Stage 1, as outlined above. If procedural stages are bypassed, an LIA Guardianship Child should be made aware of the reason for this by the Guardianship Manager (GM).

Stage 1: Verbal Warning

The homestay host should:

- note down a Stage 1 using the Behaviour Incident Report Form (available on the LIA Website), outlining the actions the Child must take, changes they need to make, or sanctions imposed in response to the incident
- discuss with the Child why their behaviour was not appropriate; give the child the opportunity to explain or defend their actions; secure verbal commitment from the child that they plan to meet the requirements of the stage 1 plan and verbally warn the child that the consequences of not meeting the requirements of the stage 1 plan will be to move them to Stage 2 of the disciplinary procedures and to inform LIA who will inform their parent(s)/carer(s) and representative agent, if applicable
- if the matter is resolved, complete and return the behavioural incident report form to the GM at LIA
- if the matter is not resolved, update the behavioural incident report form with the details to date and send to the GM at LIA who will inform the child's parent(s)/carers(s) and representative agent (if applicable) of the details of the incident, and move the procedure to Stage 2

Stage 2: Written Warning

Behavioural incidents not resolved by a Stage 1 procedure, second cases of behavioural incident (the incident may be the same as or different to the first incident), and more serious behavioural incidents should be managed using a Stage 2 procedure.

The homestay host should:

- note down a Stage 2 plan on the behavioural incident report form, outlining the actions the child must take/changes they need to make/sanctions imposed in response to the incident
- talk with the child to give the child the opportunity to explain why they did not meet the requirements of the stage 1 plan and inform the child of the Stage 2 plan and ensure that they understand it
- ask the child how they plan to meet the requirements of the Stage 2 plan and whether they require help to do so
- secure written commitment from the child that they plan to meet the requirements of the Stage 2 plan
- inform the child that LIA has informed their parent(s)/carer(s) and representative agent, if applicable, about the incident and the action taken to date
- warn the child in writing that the consequences of not meeting the requirements of the Stage 2 plan will be to move them to Stage 3 of the disciplinary procedures and to keep their parent(s)/carer(s) and representative agent, if applicable, informed

For cases of repeated or more serious misconduct, the LIA Guardianship Manager should issue the Stage 2 written warning.

If the matter is resolved, the GM should complete and save the Behavioural Incident Report Form in the child's file, update the LIA Principal and inform the child's parent(s)/carer(s) and representative agent (if applicable) that the incident is resolved.

If the matter is not resolved, update the Behavioural Incident Report Form with the details to date, send a copy to the GM at LIA who will inform the child's parent(s)/carer(s) and representative agent (if applicable) of the details of the incident update, and move the procedure to Stage 3.

Stage 3: Incident Meeting with all Parties

Behavioural incidents not resolved by a Stage 2 procedure, third incidents, and more serious behavioural incidents should be managed using a Stage 3 procedure.

The Guardianship Manager should:

- arrange a meeting with the homestay host, child and GM to review the details of the incident and determine a Stage 3 plan, in particular to give the child the opportunity to explain why they did not meet the requirements of previous stage plans. This could take the format of a telephone meeting.
- inform the child of the Stage 3 plan and ensure that they understand it
- ask the child how they plan to meet the requirements of the Stage 3 plan and whether they need help to do so
- ask the child to confirm in writing that they plan to meet the requirements of the Stage 3 plan
- inform the child that their parent(s)/carer(s) and representative agent, if applicable, have been informed about the incident meeting and the action taken to date
- warn the child **in writing** that the consequences of not meeting the requirements of the Stage 3 plan will be to move them to Stage 4 of the disciplinary procedures, which may result in a requirement to terminate LIA Guardianship Services.
- arrange any support requested by the child to meet the requirements of the Stage 3 plan
- monitor closely the progress of the child during Stage 3
- discuss with the homestay host and child whether the Stage 3 plan requirements have been met
- if the matter is resolved, complete and save Behavioural Incident Report Form in the child's file, update the Principal and inform the child's parent(s)/carer(s) and representative agent (if applicable) that the situation is resolved
- if the matter is not resolved, update the Behavioural Incident Report Form with the details to date, discuss with the Principal and inform the child's parent(s)/carer(s) and representative agent (if applicable) of the details, and move the procedure to Stage 4

Stage 4: Serious / Gross Misconduct Disciplinary action

The Principal will:

- review the Behavioural Incident Report Form and take one or more of the following immediate actions, depending on the nature of the incident(s):
- request further investigation into the incident where more robust evidence is required to substantiate an allegation or where anyone involved may have acted subjectively, inappropriately or in a biased manner

- report the child's activities to the police where cases of misconduct involve criminal activity, or where criminal activity is suspected and police investigation is required to substantiate an allegation
- remove the child from the homestay with immediate effect if they feel that the child's continued presence puts their own welfare or safety at risk or that of other children, the homestay host and/or members of the homestay host's family

All actions will be recorded and communicated to the relevant people and organisations by the Principal.

LIA's Safer Recruitment Policy and Procedures for Homestay Hosts

Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

London International Agency is committed to recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children; this is an essential part of safeguarding. The robust screening of applicants is proven to act as a deterrent for offenders seeking employment with access to children in order to harm them. To this end, LIA seeks the understanding and cooperation from homestay hosts and their families new to LIA in the recruitment process and compliance with on-going requests for information and home visits.

DBS (Disclosure and Barring Service)

The work of LIA is classified by the government as regulated activity. This is the term most commonly used to describe roles where a suitability/criminal records check is required – roles involving responsibility for or substantial access to under 18s. In broad terms, regulated activity is any position that has direct contact with children. Any person that is engaged in 'regulated activity' as defined by the Safeguarding Vulnerable Group Act 2006 (England & Wales) and parallel laws in Scotland and Northern Ireland requires an enhanced disclosure check.

- LIA will ensure that every permanent member of the household aged 16 and over will have a current, clear and valid Enhanced DBS check.
- LIA homestay hosts are required to register annually for the DBS Update Service.

Any criminal records (including spent convictions) will be considered with reference to the Rehabilitation of Offenders Act 1974 and Exceptions to the Act.

Recruitment

Recruitment materials (homestay host information) include reference to LIA's commitment to safeguarding the welfare of every child in its care and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after our children safely, especially under 18s.

- Proof of identity is required (original documents will be checked on the initial home visit).
- Interview questions will explore a potential LIA homestay host's attitude to working with under 18s.
- Interview questions about disability and health will be asked in order to establish whether there may be any physical or mental obstacles to homestay hosts fulfilling their specific role that cannot be overcome.
- Homestay Hosts are obliged to inform LIA of any change of circumstance within the home which may affect child protection, eg: addition of household members over the age of 16.
- A single central register of all checks made during recruitment is kept at the LIA Office.

Induction

LIA is responsible for ensuring that their homestay hosts and families understand their safeguarding responsibilities for LIA Guardianship Children under 18 and are skilled and confident in managing the homestay and in looking after children.

The LIA Induction Process

- All homestay hosts have access to the **LIA Guardianship Website** with detailed policy and guidance on their responsibilities, institutional policies, procedures and expectations of professional conduct and ethical behavior relating to under 18s.
- A **homestay/welfare/safeguarding induction** is carried out by an LIA Guardianship Manager.
- LIA homestay hosts are required to undertake Basic Child Protection Awareness Training
- LIA Guardianship Managers are then fully available in office hours for any further contact to respond to queries from homestay hosts.
- Out of hours, a 24 hour emergency phone number is available staffed by LIA at all times.

Updates to policies

Updates to policies are uploaded to the LIA Guardianship Website and are also sent by email to all registered LIA homestay hosts.

Ongoing training

All homestay hosts and their families should be fully aware of systems within LIA which support safeguarding and these are explained to homestay hosts as part of the induction process. This includes: LIA's safeguarding policy; the code of conduct; and the designated safeguarding lead; child protection training and e-safety.

All adults in contact with under 18s need to demonstrate appropriate knowledge of this policy, their responsibilities and the procedures for reporting any incident of harm or abuse.

Recruitment of ex-offenders

LIA will not unfairly discriminate against any applicant on the basis of conviction or other details revealed. LIA makes recruitment decisions on the basis of merit and ability, if an applicant has a criminal record this will not automatically bar him/her from working with LIA. In view of the fact that all positions within LIA will amount to "regulated positions" within the meaning of the Protection of Children Act 1999 (as amended by the Criminal Justice and Courts Services Act 2000), they are exempt from the Rehabilitation of Offenders Act 1974.

All convictions, cautions, reprimands or final warnings that are not "protected" as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013) must be declared when applying for a position at LIA. Failure to disclose a previous conviction may lead to an application being rejected or, if the failure is discovered after a homestay host starts working with us, may lead to termination of contract on the grounds of gross misconduct. A failure to disclose a previous conviction may also amount to a criminal offence under the relevant legislation, it is unlawful for LIA to work with anyone who is included on the barred lists maintained by the DBS of individuals who are considered unsuitable to work with children or vulnerable adults

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within LIA. LIA will report the matter to the Police and the DBS if:

- LIA receives an application from a disqualified person
- LIA is provided with false information in, or in support of an application
- LIA has serious concerns about an applicant's suitability to work with children

Retention of records

If an applicant is appointed, LIA will retain any relevant information provided on their application form (together with any attachments) and the pre-employment check data on their personnel file. If the application is unsuccessful, all documentation relating to the application will normally be confidentially destroyed after six months.

LIA's Safer Recruitment Policy and Procedures for Staff

Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

Introduction

London International Agency is committed to recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children; this is an essential part of safeguarding. The robust screening of applicants is proven to act as a deterrent for offenders seeking employment with access to children in order to harm them.

DBS (Disclosure and Barring Service)

The work of LIA is classified by the government as regulated activity. This is the term most commonly used to describe roles where a suitability/criminal records check is required – roles involving responsibility for or substantial access to under 18s. In broad terms, regulated activity is any position that has direct contact with children. Any person that is engaged in 'regulated activity' as defined by the Safeguarding Vulnerable Group Act 2006 (England & Wales) and parallel laws in Scotland and Northern Ireland requires an enhanced disclosure check.

LIA ensures that every person working within LIA and having access to information about children have a current, clear and valid Enhanced DBS check, registering annually for the update service.

Recruitment

- Job descriptions include reference to LIA's commitment to safeguarding the welfare

of every child in its care and all adults associated with our organisation will be expected to share our ethos and actively engage in looking after our children safely, especially under 18s.

- Two references are requested. References will be followed up and referees will be asked whether there is any reason not to engage the applicant where they have substantial access to under 18s. Follow up phone calls are made to verify the references.
- LIA will seek a full employment history for prospective staff and reserves the right to approach any previous employer. All gaps in CVs must be explained.
- Proof of identity and qualifications are required (original documents will be checked at interview).
- Interview questions will explore a candidate's attitude to working with under 18s.
- Interview questions about disability and health will be asked in order to establish whether there may be any physical or mental obstacles to homestay hosts fulfilling their specific role that cannot be overcome.
- The interview panel will always include a staff member who has completed the DfE Safer recruitment in education e-learning module: <http://www.nspcc.org.uk/what-you-can-do/get-expert-training/safer-recruitment-education-course/>

Induction

- LIA is responsible for ensuring that all staff understand their safeguarding responsibilities and are skilled and confident in managing these responsibilities.
- Staff induction includes a detailed description of our policies, procedures, practices and provisions in relation to the safeguarding and welfare of our children.
- Staff are familiarized with relevant reporting lines and communication channels within LIA to enable them to effectively raise concerns or issues.
- Staff are informed about and expectations for their own conduct.
- Evidence that all induction procedures have been conducted is retained in staff files.

Child protection training

- All LIA staff have undertake Level 1 child protection training.
- The Child Protection Officer trained to Level 3 and will keep other staff regularly updated and refreshed with safeguarding information.

Recruitment of ex-offenders

LIA will not unfairly discriminate against any applicant for employment on the basis of conviction or other details revealed. LIA makes appointment decisions on the basis of merit and ability, if an applicant has a criminal record this will not automatically bar him/her from employment within LIA. In view of the fact that all positions within LIA will amount to “regulated positions” within the meaning of the Protection of Children Act 1999 (as amended by the Criminal Justice and Courts Services Act 2000), they exempt from the Rehabilitation of Offenders Act 1974.

All convictions, cautions, reprimands or final warnings that are not “protected” as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013) must be declared when applying for a position at LIA. Failure to disclose a previous conviction may lead to:

- an application being rejected or, if the failure is discovered after employment has started, may lead to summary dismissal on the grounds of gross misconduct; a failure to disclose a previous conviction may also amount to a criminal offence
- under the relevant legislation, it is unlawful for LIA to employ anyone who is included on the barred lists maintained by the DBS of individuals who are considered unsuitable to work with children or vulnerable adults

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within LIA. LIA will report the matter to the Police and the DBS if:

- LIA receives an application from a disqualified person
- LIA is provided with false information in, or in support of an application
- LIA has serious concerns about an applicant’s suitability to work with children

LIA’s Emergency Policy

Creation Date	Review Date	Version	Director
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08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins
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Examples of emergency situations and response

Emergency Procedures

As an accredited guardian, LIA is well-prepared to act in the event of an emergency. Although we try to plan for every event, situations can arise that are beyond our control. These procedures are in place to assist staff in responding to an emergency.

As well as the Local Guardian, LIA have a 24-hour emergency phone number 07795 107532 which is sent to all of our homestays, parents, students and schools. Between 9am – 5pm UK time, this goes through to our Head Office. After 5pm and before 9am, the call will be answered by the LIA Director or DSL.

LIA will always act in the best interest of our students and outlined below are responses to specific emergency situations.

How to deal with an emergency

If an emergency take place, the following steps will guide you to the support that you need.

- If it is a medical emergency or the student is in harm's way, you should call 999 first. Then call the LIA 24/7 number (07795 107532) to inform them of the situation and that you have already called the emergency services.
- If the emergency does not pose an immediate threat to the student, please call 07795 107532. The member of staff you speak to will want to know as much information about the emergency as possible. They will then guide you to the most appropriate action. They may need to speak to a DSL or Director for guidance.

Examples of emergency situations and response

Please note that these are a few examples of situations. The steps above are valid in the case of any emergency that arises.

Outbreak of an infectious disease

The Coronavirus outbreak has meant that guardians have had experience of dealing with a global pandemic. With an outbreak of this scale, it is first essential that LIA follows the guidance set out by Public Health England and the UK Government. This guidance must be followed and cannot be superseded by the wishes of an individual or organisation.

In the event of a school closure, LIA will find alternative accommodation for students and inform the host family of any government guidance and possible quarantine. We will keep the school, parents and an agent (if involved) of where the student will stay and

give ongoing updates about their return to school or onward travel plans.

Bear in mind that not all host families would be willing to take a student during an infectious outbreak. This may mean a student will need to travel further than normal to arrive with an appropriate and willing host family.

Death of a student

Understanding that this is the most distressing news for any family, LIA will offer all assistance in communication between all parties, the school, the Police, medical staff, the family, and any other outside agency.

Assistance may include:

- Information sharing
- Working alongside the school & appropriate authorities
- Dealing with the media, if required
- Repatriation

Suspension/Expulsion

LIA is there to assist a student if they are asked to leave the school. As the Educational Guardian, we will need a full report and reason for them being asked to leave.

For a suspension, the Local Guardian will arrange a host family until the date the school decide the student can return to school.

For an expulsion, the student may depart school and return to their home country direct. Depending on flight availability, we may need to arrange short term accommodation in a host family until the next flight can be arranged.

LIA is committed to the equal care for all students, irrespective of the reason they are suspended or expelled.

Cancelled/Missed Flights

LIA are well-prepared and experienced in the event of travel disruption. Our dependable transfer companies are very experienced in monitoring flight information and if there are any changes, they will inform us accordingly. If the flight is delayed, it may still be worth travelling to the airport and waiting for the delayed departure. In the event of a flight cancellation, we can accommodate students in a host family until a new flight is arranged. Parents will be kept informed during this process.

LIA's Missing student policy

Creation Date	Review Date	Version	Director
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08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins
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The safety of all students is paramount and it is essential we know where all students are at all times. Should a student go missing, LIA will take the following steps to ensure their safe return to our care.

When a student is identified as not being at a location they are meant or are expected to be at, the reporting individual must take proactive steps to trace the person's whereabouts prior to contacting the police. Such steps would include:

- Call the student's mobile phone
- Contact the LIA 24 hour emergency number +44 7795107532
- Contacting the missing student's school, host family & friends
- Checking social media

Children consistently missing education

Our LIA Student Handbook is clear that students must attend school every day unless authorised absence has been agreed.

Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important that LIA is made aware and swiftly respond to children missing from education so we can identify potential causes and help prevent the risk of them going missing in the future.

Reporting to the Police

The Police will only become involved after all reasonable checks to locate the student have been carried out. If the student is not located, the reporting individual should contact the Police via 101 to report them as being missing from their address.

The primary function of the Police is to investigate the disappearance and attempt to locate the student prior to any harm befalling them. Police response and associated actions will be based on a police risk assessment of the incident and knowledge of the student concerned, which will utilise information from partners and those who know the person.

When a child is found

The attitude of professionals, such as police and social workers, towards a student who has been missing can have a big impact on how they will engage with subsequent investigations and protection planning. However 'streetwise' they may appear, they are children and may be extremely vulnerable to multiple risks. A supportive approach when a student returns, actively listening and responding to their needs, will have a greater chance of preventing the student from going missing again and safeguarding them against other risks.

Actions to be Followed by Staff once the pupil is found

- Staff will talk with, take care of and comfort the student.
- Staff will speak with the other students to ensure that they understand why they should not leave without obtaining permission and notifying their Local Guardian.
- The DSL will speak with the parents/agent to report the incident, and then record an account of the incident by writing a letter to the parents.
- The DSL will carry out a full investigation involving, if appropriate, the Police and the appropriate Local Safeguarding Children Board.
- The written report of the incident will record details of time, place, members of staff, the circumstances in which the student went missing, an outline of what was understood to have happened, the length of time during which the student was missing and an initial explanation of how the incident appeared to have arisen. Written statements may be invited from all.
- Any media questions will be referred to a partner / DSL at Head Office
- All relevant procedures will be reviewed in the light of the incident.

LIA's Whistleblowing Policy (SP6)

Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

What is a whistleblower?

You're a whistleblower if you're an employee or agency worker and you report certain types of wrongdoing. This will usually be something you've seen at work - though not always. The wrongdoing you disclose must be in the public interest. This means it must affect others, e.g. the general public. As a whistleblower you're protected by law - you shouldn't be treated unfairly or lose your job because you 'blow the whistle'. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future.

Complaints that count as whistleblowing

You're protected by law if you report any of the following:

- a criminal offence, e.g. fraud
- someone's health and safety is in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, eg: doesn't have the right insurance
- you believe someone is covering up wrongdoing

Complaints that don't count as whistleblowing

Personal grievances (e.g. bullying, harassment, discrimination) aren't covered by whistleblowing law, unless your particular case is in the public interest.

Who to tell and what to expect

You can report your concern to the Principal at LIA. There are other options if you don't want to report your concern to LIA, e.g. you can get legal advice from a lawyer, or tell a prescribed body such as AEGIS.

Making your claim anonymously or confidentially

You can tell LIA or a prescribed body anonymously but they may not be able to take the claim further if you haven't provided all the information they need. You can give your name but request confidentiality - the person or body you tell should make every effort to protect your identity. If you report your concern to the media, in most cases you'll lose your whistleblowing law rights.

What LIA or a prescribed body will do

LIA or the prescribed body will listen to your concern and decide if any action is needed. You may be asked for further information. You must say straight away if you don't want anyone else to know it was you who raised the concern. You won't have a say in how your concern is dealt with. LIA or the prescribed body can keep you informed about the action they've taken, but they can't give you much detail if they have to keep the confidence of other people.

The NSPCC has a whistleblowing helpline which is available for staff who do not feel able to raise concerns regarding child protection failures within the organisation. Staff can call 0800 028 0285 between 8am and 8pm Monday to Friday or can email: help@nspcc.org.uk. In addition, Protect provide a free, confidential advice line for concerned staff to call before whistleblowing. The helpline is 020 3117 2520 and their website is: www.protectadvice.org.uk/.

Low level concern

This policy is in place to cover concerns that do not meet the harm threshold. It is in place to manage and record any such concerns and take appropriate action to safeguard children. LIA promotes an open and transparent culture in which all concerns are dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that someone (an adult or child) may have acted in a way that:

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

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

- an adult being over friendly with children
- a member of staff having favourites
- taking unauthorised photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating a peer or child

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

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of LIA; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

LIA aims to achieve the purpose of this policy by:

- Ensuring staff understand and abide by the Staff Code of Conduct Policy
- Encouraging staff to raise to share any concerns
- Address unprofessional/inappropriate behaviour immediately
- Flagging any inadequacy in LIA's safeguarding policies and procedures

Who to share a concern with

Any concern should be shared with the following DSL

- Krestyna Huggins - london.int.agency@btinternet.com

The DSL will decide if it is a low-level concern but may refer the concern to LADO if it meets the threshold for harm as described in our Safeguarding Policy.

How will LIA respond

All low-level concerns are recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then LIA will aim to do this as far as reasonably possible. Records are kept securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

If the concern has been raised via a third party, such as a school, the DLS will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and
- to the individual involved and any witnesses

Where a pattern of behaviour is identified, LIA will decide on a further course of action, either through our disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, the case will be referred to LADO.

LIA's LIA Safe Placement Policy (SP7)

Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

Placements of LIA Guardianship Children

- At the recruitment stage, all Homestay Hosts will be required to inform LIA about any persons aged 16 and above who are normally resident in their homes and those persons will be subject to DBS procedures.
- When booking an LIA Guardianship Child to a new homestay host for the first time, the Guardianship Manager (GM) will check that DBS checks have been completed or will be completed before that child's arrival.
- The GM will carry out a safeguarding induction prior to the arrival of their first child, to ensure that the homestay host receiving the child and other household members have read, understood and comply with LIA's safeguarding policy. Any concerns about non-compliance at any stage of the process will be immediately flagged up and appropriate steps taken.
- Existing homestay hosts are made aware that they must keep LIA up-to-date with any changes to their household and any adults who might be staying as guests during their Guardianship child bookings and the GM will regularly check for changes when contacting homestay hosts to reaffirm availability, discuss bookings, etc.

Placements of two Guardianship children in same household

- Guardian children placed together in the same house should not normally have an age difference of more than two years.
- Children aged over 18 should not normally be placed in the same household as children aged under 18.
- If, in exceptional circumstances, a child over 18 is placed with a child under 18, the age difference should be no more than one year, risks will be assessed, agreement will be secured beforehand from the 17 year old child's parents.

LIA's Bullying Policy and Procedure (SP8)

Creati on Date	Review Date	Versio n	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

What is bullying?

Bullying can occur in any group of people whatever its type or size or the age of its members. There are many different forms of bullying; at one end of the scale it can be teasing and at the other it becomes serious assault or harassment. Verbal and psychological bullying can be just as harmful and hurtful as physical violence. Sexual and racial harassment are particularly serious forms of bullying. Many children, and adults, are bullied because they are seen to be 'different' – because of their race, religion or culture, because of their sexuality, because of their gender, or because of any special educational needs or disabilities they may have.

Cyberbullying

This is a form of bullying which uses technology to deliberately harm or upset others. This type of bullying can happen in many ways, using mobile phones or the internet and could include:

- sending hurtful messages or using images
- leaving malicious voicemails
- a series of silent calls
- excluding them from chat/messaging rooms/areas
- 'happy slapping' – sending video/images of people being bullied, so others can see

Signs of Bullying

Some of the ways in which children and young people have described bullying include:

- being called names
- being teased
- being pushed or pulled around
- having money or personal possessions taken or damaged
- having rumours spread
- being ignored or left out

- being hit, kicked or physically hurt in some way
- being threatened or intimidated

Effects of Bullying

The effects of bullying can lead to children and young people:

- becoming depressed
- experience low self esteem
- becoming shy and withdrawn
- experiencing physical complaints, like constant stomach aches and headaches, which are brought on by stress
- feeling anxious

LIA does not tolerate the bullying of other people in any form whatsoever and all incidents of bullying reported to LIA will be fully investigated.

LIA Guardianship children will:

- respect other people, their space and their belongings
- be kind to others, even if they are not our friends
- not walk away if we see someone being bullied
- try to get help and tell a responsible adult
- ask for help if we are being bullied

LIA Guardianship children are given the following advice about bullying:

- Talk to or contact someone you trust, such as your homestay host, parent, friend or even contact Childline on 08001111 to talk to someone you don't know, safely.
- Be persistent. If the first person you talk to doesn't help, don't give up. Speak to someone else.
- If you can, write down everything that has been said or done to hurt you. Try to write down how you feel. When you have found someone you can trust, discuss what you have written.
- Ask the person you talk to not to do anything without telling you about it first. You have a right to know what is being done on your behalf and to say whether you think it is a good idea or not. If you find it difficult to talk to an adult ask someone to talk to an adult on your behalf.
- Telephone ChildLine (Freephone 0800 1111). Their helpers provide a confidential helpline for young people
- Telephone the LIA emergency number: +44 (0) 7795197532

- Most importantly, do something. Sometimes bullying stops quickly, but doing nothing means it may continue until someone is seriously upset or hurt.

LIA's E-Safety Policy (SP9)

Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

Purpose

This policy applies to all members of the LIA community (including staff, children, parents/carers, visitors and guests in the homestay). It is a statement of the aims, principles, strategies and procedures for e-safety throughout LIA. The E-Safety Policy should be read in conjunction with our Data Protection and Information Sharing Policy and Safeguarding Policy.

You have a responsibility to the Guardianship children in your care to know what they are doing online during their stay with you.

What is E-Safety?

E-Safety refers to child protection and safeguarding of both children and adults in the digital world. It is about learning to understand and use technologies in a safe, positive way, also about supporting children and adults to develop safe online behaviours.

Risks to children who use the internet include:

- exposure to inappropriate materials, for example, pornographic pictures and videos
- physical danger and sexual abuse, for example, through 'grooming' by paedophiles
- cyberbullying – persistent bullying through the digital medium
- losing control over pictures and videos
- obsessive use of the internet and ICT, for example, addiction to video games
- damage to online reputation
- inappropriate or illegal behaviour, for example, exposure to hate mail or offensive images
- viruses, hacking and security
- exposure to extremist material and the possibility of radicalisation
- copyright infringement, for example, the illegal sharing of music, pictures, video or

documents

E-Safety is largely concerned with internet communications. The internet is accessible from computers, laptops, tablets, mobile phones, games consoles and other devices like the iPod Touch and internet connected TV. Other communication technologies such as texting and phone calls are also covered by the term 'E-Safety'.

Why provide internet access?

The internet is an essential element in 21st century life for education, business and social interaction. LIA encourages the provision of quality internet access to enable Guardianship children to communicate with home and as a necessary tool for school work.

LIA homestay hosts are expected to install appropriate parental control software in operation on their routers.

Internet

- LIA Guardianship children aged 10-13 must have adult supervision whilst using the internet.
- LIA Guardianship children will be encouraged to tell their homestay host immediately if they encounter any material that makes them feel uncomfortable.
- Internet access will be filtered appropriate to the age of the children.

Email

- All emails sent must be professional in tone and content.
- LIA Guardianship children must immediately tell an adult if they receive offensive email.
- LIA Guardianship children must not reveal personal details of themselves or others in email communication (such as address or telephone number). LIA Guardianship children must not arrange to meet anyone without specific permission.
- LIA Guardianship children should be made aware that the writer of an email (or the author of a web page) may not be the person claimed.

Social Networking

LIA homestay hosts shall:

- behave responsibly and professionally at all times in connection with the use of social networking sites and keep up to date with privacy policies of the sites they use
- ensure that all communication with LIA Guardianship children (including on-line communication) takes place within clear and explicit professional boundaries
- use their professional judgment and, where no specific guidance exists, take the most prudent action possible and consult with the Principal of LIA if they are unsure
- co-operate with LIA in ensuring the implementation of this policy

Chatrooms and Instant Messaging

- LIA Guardianship children are not permitted to use these facilities on a homestay host's computer

LIA Guardianship Children:

- must hand mobile phones, tablets, portable electronic games and media players brought to the homestay to the homestay host at night-time, if requested by the homestay host
- are forbidden from sending abusive or inappropriate text messages
- may have their internet activity checked

LIA Homestay Hosts:

- are allowed to take digital photographs and video images of LIA Guardianship Children, but must follow guidance in the LIA Photography Policy concerning the taking, sharing, distribution and publication of those images

LIA Website:

- The point of contact on the website will be the Guardianship Organisation address, email and telephone number. Homestay host or child personal information will not be published.
- Website photographs that include LIA Guardianship Children will be selected carefully and will only be published with parental permission.
- LIA Guardianship Children' full names will not be used anywhere on the website, particularly in association with photographs.

Cyberbullyig

Cyberbullying is the use of the internet and related technologies to harm other people, in a deliberate, repeated, and hostile manner. When children are the target of bullying via mobile phones, gaming or the internet, they can often feel very alone and, a once previously safe and enjoyable environment or activity, can become threatening, harmful and a source of anxiety. Cyberbullying (along with all forms of bullying) will not be tolerated. All incidents reported will be recorded and investigated.

LIA Homestay Host Data Security

- LIA homestay hosts must not share their user account details and must not leave their computers unlocked and accessible to children.

LIA Guardianship Children

- All LIA Guardianship Children must sign the Code of Conduct and Child Agreement for Guardianship Children.
- E-Safety rules will be given to Guardianship Children in their child handbook.
- Any breaches of the Code of Conduct with reference to ICT will be referred directly to LIA and Internet access will be denied.
- LIA Guardianship Children will be informed that network and internet use on a homestay host's computer will be monitored.

Parental Support

- Parents' attention will be drawn to LIA's E-Safety Policy in the parent handbook.
- Parents will be asked to read through the LIA Guardianship Child Code of Conduct with their child and for the child to sign the agreement.

Policy Implementation

All new LIA homestay hosts receive e-safety advice and guidance as part of their induction programme to ensure they understand their responsibilities, as detailed in this policy.

LIA's Photography Policy and Procedure (SP10)
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Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

Using images of children: photographs, videos, websites and social media

We live in an age in which digital technology has vastly increased the use, and potential misuse of photography. Photographs for LIA, child and homestay host uses and those that appear in the press and LIA social media, are a source of pleasure and pride.

Children are usually abused by someone they know. The risk of a child being directly targeted for abuse through being identified by a stranger is very small. Providing reasonable steps are taken to ensure an appropriate photograph, and to protect the full name and contact details, photography of LIA Guardianship Children by homestay hosts, staff and the media is allowed, within safe practice guidelines.

Issues of Consent

The Data Protection Act 1998 affects our use of photography. This is because an image of a child is personal data for the purpose of the Act, and it is a requirement that consent is obtained from the parent of a young person under the age of 18 years for any photographs or video recordings. It is also important to ascertain the views of the child.

Consent is sought on the Guardianship Child Application form for images to be used by LIA.

Homestay hosts and their families may not use images of LIA Guardianship children online without the express consent, in writing of LIA.

Parents retain the right to withdraw consent at any stage, but they need to do so in writing.

LIA will:

- never use a child's full name online to accompany a photograph
- use the minimum information necessary to accompany a photograph
- only use images of children in suitable dress (not swimming costumes, for example)
- store photographs securely for authorised LIA use only
- only use images of under 18s where permission has been granted

LIA's Excursions Policy and Procedure

Creati on Date	Review Date	Versio n	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

Trips and activities must be organised with great care as children will probably be in unfamiliar surroundings, in a different culture, with varying degrees of confidence in spoken English. Please implement the guidelines below at every opportunity in order to establish good practice.

- Plan your trip well in advance: times, maps and details of meeting points.
- A risk assessment should be carried out for each activity / excursion with the child and placed on your home file.
- Guardianship children should have their mobile phones fully charged, switched on at all times, with sufficient credit for emergencies and have emergency numbers to call (homestay host and LIA emergency phone number) stored in their phones.
- Homestay hosts should always have the mobile numbers of all children.
- Homestay hosts should agree on meeting places and times with their children, and these should be marked on maps.
- Under 18s who have parental permission may be given some free time to explore by themselves but must always tell their homestay host where they are going and what time they will return.
- Homestay hosts and children will need to agree a clear procedure in the event of a child becoming lost on an excursion, e.g. to wait as long as possible at the agreed meeting point, and LIA contacted and the police being informed if the child fails to appear before a reasonable time.
- Take particular care when crossing the road with your child, remind children to look the right way!
- No activity or excursion is to be undertaken that falls outside the child's insurance cover.
- All activities carrying a high risk level e.g. horse-riding, must be undertaken at a

designated centre which carries appropriate insurance.

- Parental permission is required for children to take part in high risk activities, e.g. climbing, sailing, skiing and this must be requested through the LIA Guardianship office.
- LIA Guardianship children should be made aware of the risks in picking up a taxi on the street and should be advised to pre-book taxis at all times.

Local Area

Our Guardianship children do not read the many culture-based signals that we are constantly, often subconsciously, interpreting to help us stay safe; they need guidance and help.

In the local area, homestay hosts must provide children with some specific and clear guidelines about areas to avoid, using taxis safely, etc. Please add this information to your Home File.

LIA's Travel Policy and Procedure (SP12)

Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

Child travel

LIA is committed to safeguarding the welfare of every child in its care and this includes making safe arrangements for arrival, departure and travel within the UK.

Under 18s

- All children under 17 travelling without an adult should book a LIA transfer or be met by a local guardian.
- Travel arrangements are arranged through the Guardianship Head Office and not directly with the homestay host.
- In no circumstances will under 16s be allowed to travel alone or by public transport. It

is a condition of enrolment on the guardianship scheme that suitable transfer arrangements for children are in place.

- Parents will be sent a risk assessment on children aged 16 to 18 travelling independently and asked to reconsider their decision based on the information in the risk assessment.
- In the event that a child is given permission to travel by public transport to the homestay host, school or airport, then full travel details must be forwarded to the LIA Guardianship Manager. Parents must sign a disclaimer absolving LIA of all responsibility for the journey as LIA cannot be responsible for children travelling independently.
- Full transfer booking information is provided by LIA to the child including the meet and greet service, driver telephone number, LIA emergency telephone number, the destination address and contact details and emergency procedures. The travel information includes the departure airports, flight and times, and any connecting flight details, as well as the arrival data.
- Children are given travel advice to accompany their transfer confirmation telling them what documents they need to bring with them and emergency procedures.
- Children are informed that they could be delayed at four points once they have landed: immigration; a possible medical check; waiting for luggage; or at customs control checking what passengers are bringing into the country.
- Children are informed that they may be asked detailed questions about why they are coming to the UK, the school, their Homestay Host and family and who is meeting them at the airport.

Booking Flights

Parents/partners will:

- Book flights in good time to ensure suitable daytime flights are available on the required dates of travel.
- Book flights which arrive/depart between 9am and 9pm. Earlier or later flight times are extremely difficult to manage as they are not acceptable times to arrive or depart as a guest in a homestay host's home and are not compliant with most school policies.

- Complete detailed travel information for the arrival of the child no less than five working days before the child departs. Last-minute arrangements are not acceptable, as messages could go astray and children could arrive without anyone to meet them.
- Book an Unaccompanied Minor Service for any child travelling alone under 14 directly with the airline and inform LIA that the child is travelling as a UM so appropriate arrangements for this can be made and the child is handed over to the named LIA representative.
- Buy an inexpensive mobile for their child before they leave their home country, ensure this is suitable for use in the UK with international roaming, is fully charged and with sufficient credit for an emergency call. The mobile must be switched on as soon as immigration has been passed and LIA must be provided with the mobile number when sending the travel information.

Safe Travel

- A 24 hour emergency number is available and LIA appointed drivers or homestay hosts will call the person on duty if there are any problems whatsoever with the travel arrangements, such as delays or flight cancellations.
- Drivers and homestay hosts providing the meet and greet service will stand in a prominent position in the arrivals hall using the LIA welcome sign with the child's name on it.
- Taxi companies that LIA work with have enhanced DBS checks for all their drivers and have signed a service agreement with LIA to ensure a high quality service.

Shared Transfers

- Where shared transfers are booked, one -and-a-half hours' waiting time with the LIA representative / driver is the maximum waiting time (except in unplanned events eg: airline delays).

Travel within the Homestay

- Homestay hosts and their families who transport LIA children are required to have their car insured for business use and to comply with the law regarding child restraints.

- Homestay hosts are advised to sit under 18s in the rear of the car when transporting children. This avoids any likelihood of any accusations of inappropriate behaviour.

LIA's Health, Safety and Welfare Policy

Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

Health and safety

- LIA recognises its responsibility under the Health & Safety at Work, etc. Act 1974 to provide for the health, safety and welfare of their employees, children, members of the public and any others who may be affected by LIA's activities.
- To this end LIA will, so far as is reasonably practicable, fully comply with the requirements of the said Act, and such of its attendant Regulations as may apply, by making suitable and sufficient arrangements.

Within the LIA Office

LIA will:

- develop and maintain safe systems of work
- give sufficient information, instruction, training and supervision to ensure the health, safety and welfare of all its staff, children and others working within LIA premises, and during activities and excursions
- protect the health, safety and welfare of visitors to LIA
- provide equipment that is fit for purpose and maintained in accordance with the necessary requirements
- maintain a safe and healthy place of work, with safe access to that place of work
- provide induction training which will include but not be limited to the Health & Safety Policy, First Aid arrangements and Fire Precautions/Procedures
- positively consider the environmental impact of all LIA activities; and, formally consult with employees on all matters having effect on their health, safety and welfare at work
- update staff on latest developments in health and safety
- further, detailed information is provided in the LIA Staff Handbook.

Guidance for Homestay Hosts

LIA will:

- provide competent, professional guidance, training and support as required

- where applicable, issue detailed safety policy, instructions and guidelines to homestay hosts relating to their activities, and ensure homestay hosts are conversant with them

Homestay Hosts will:

- follow all health and safety advice and guidance from LIA
- initiate first aid in the event of an accident, and ensure that the accident is recorded and reported to LIA
- carry out a fire risk assessment of their home, send this to LIA and add this to the LIA Home File
- have an up-to-date gas safe check in place and send this to LIA annually
- Carry out a home risk assessment and add this to the LIA Home File

It is the duty of all members of LIA staff, homestay hosts and Guardianship children to take reasonable care for the health and safety of themselves, and of any others who may be affected by their acts or omissions.

Welfare

LIA contributes to children' wider well-being by:

- helping each child achieve the best possible educational outcomes
- dealing with bullying and discrimination and keeping children safe
- dealing with bullying in accordance with the LIA's anti-bullying policy
- encouraging children to behave responsibly

LIA has policies to:

- prevent unsuitable people working with under 18s
- promote safe practice and challenge poor and unsafe practice
- identify instances where there are grounds for concern about a child's welfare
- take appropriate action to keep children safe

Missing Guardianship child procedure

A child may be identified as missing if their whereabouts cannot be confirmed visually, from information provided by the child or other trustworthy people with regard to their movements or telephone contact with them or their parent/guardian.

If a homestay host thinks a child is missing, they must:

- attempt to ascertain whereabouts from the last people in contact with the child
- attempt to contact the child on his/her mobile phone
- check all places the child was last seen

If a child is still missing, the homestay host should contact the LIA Principal or member of staff on duty by telephone. Homestay hosts should NOT telephone parents themselves.

LIA will:

- contact their parents/guardians (with due regard for time zones).
- request assistance as appropriate.
- request a search of local roads, shops, potential haunts etc is made on foot or by car where appropriate.

On completion of this and any subsequent searches made, the Principal and parents/guardians will continue to be informed of progress.

The Principal (or in her absence, the person on duty), will arrange for the Police to be informed.

If the child is found, or the incident is otherwise resolved:

- the Principal will be directly informed directly by the homestay host
- the Police will be informed if they have been involved.
- the Principal will initiate a full inquiry, and provide a written report
- this report and the incident log will be kept securely in the LIA Office

After the incident:

- the homestay host or Guardianship manager will sensitively discuss the incident with the child

- the Principal will sensitively discuss the incident with the parents/guardian

LIA's Prevent Policy			
Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

What is Prevent

The national Prevent strategy is designed to reduce the number of serious incidents and to catch anyone especially vulnerable people before they enter the criminal justice system.

Meeting our Prevent Duties and Tackling Extremism

London International Agency understands its responsibilities under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalized or drawn into terrorism and seeks to meet its obligations in the ways shown below.

Content

- LIA accepts children aged 10 to 18 all year from around the world.
- LIA promotes a multi-cultural environment where respect for and tolerance of other beliefs is required.
- LIA's head office is located in one of the boroughs of a multi-cultural city and places Guardianship children with homestay hosts in cities, towns and villages all over the UK.

Prevent Lead

Responsibility for ensuring Prevent Duty lies with Krestyna Huggins, Principal and Designated Safeguarding Lead for the Prevent Strategy.

Risk Assessment and Procedures

- A risk assessment has been produced by the LIA Lead Contact for the Prevent Strategy and held in the LIA ; it will be reviewed and updated annually.
- The LIA Lead Contact for the Prevent Strategy has received training in Prevent

policy and risk.

- All members of the LIA team at head office will undertake Prevent online training.
- All homestay hosts will receive Prevent guidance from LIA and will undertake online Prevent training.
- LIA will make and maintain contact with the local police/ local authority Prevent coordinator in all areas where we have children to understand their role, the support available, (e.g. via the Channel process) and a list of contacts for referrals

LIA will counteract risks by:

- Promoting a safe and supportive international environment via clear expectations of accepted behaviors and those. Including radicalization and extremism, that will not be tolerated.
- Promoting the core British values:
 - I. democracy
 - II. the rule of law
 - III. individual liberty
 - IV. respectful tolerance of different faiths or beliefs,

through documents given to children (child handbook), via information on arrival on British culture and traditions and via homestay placements. The approach is to educate that this is how things are in UK, although it may be different to your country.

- Where possible, developing critical awareness and thought to counter accepting extremism without question, especially of online material.
- Challenging radical or extremist views in any context (formal or informal) via stated procedures. In most situations this would require an immediate response re the tolerance expected then reporting concerns.
- Being ready to react when world or local events (e.g. Paris attacks) cause upset and the likelihood of conflicting feelings being expressed. Prevent lead to take initiative in these situations.
- Asking homestay hosts to have strong filters on the Internet and clear rules on accessing extremist/terrorist websites/uses of social networks to exchange extremist/terrorist views.
- Homestay hosts getting to know children and their circumstances making it easier to spot changes in behavior.
- LIA staff and homestay hosts being observant and vigilant in noticing any signs of radical or extremist behavior.
- LIA staff and homestay hosts supporting any children identified as vulnerable.
- LIA staff and homestay hosts themselves not supporting or funding and extremist organizations.
- LIA staff and homestay hosts exemplifying the core British values.

Understanding the risk of extremism

- Staff, children and homestay hosts may come into contact with LIA already holding extremist views. Or, whilst in a homestay, they may be influenced by a range of factors: global events' peer pressure, media family views, extremist materials (hardcopy or online), inspirational speakers, friends or relatives being harmed, social networks, and more.
- People who are vulnerable are more likely to be influenced.
- Their vulnerability could stem from a range of causes including: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crises, victim of hate crime or discrimination and bereavement.

Understanding terminology

Radicalisation

Act or process of making a person more radical or favoring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of mind.

Extremism

Holding extreme political or religious views which may deny right to any group or individual. Can be expressed in vocal or active opposition to Core British values and can refer to a range of views, e.g. racism, homophobia, right-wing ideology, as well as any religious extremism.

We can also contact our local police force or dial 101 (the non-emergency number). They can talk to us in confidence about our concerns and help us gain access to support and advice. The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and homestays to raise concerns relating to extremism directly. Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk.

Our 24 hour emergency number is 07795107532

LIA's Low – Level Concerns Policy

Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

The term ‘low-level’ concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that someone (an adult or child) may have acted in a way that:

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

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

- an adult being over friendly with children
- a member of staff having favourites
- taking unauthorised photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating a peer or child

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

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of LIA; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the right person and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

LIA aims to achieve the purpose of this policy by:

- Ensuring staff understand and abide by the Staff Code of Conduct Policy
- Encouraging staff to raise to share any concerns
- Address unprofessional/inappropriate behaviour immediately
- Flagging any inadequacy in LIA's safeguarding policies and procedures

Who to share a concern with

Any concern should be shared with one of the following DSL's

Krestyna Huggins – info@londonintagency.com

The DSL will decide if it is a low-level concern but may refer the concern to LADO if it meets the threshold for harm as described in our Safeguarding Policy.

How will LIA respond

All low-level concerns are recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then LIA will aim to do this as far as reasonably possible. Records are kept securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

If the concern has been raised via a third party, such as a school, the DLS will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously, and
- to the individual involved and any witnesses

Where a pattern of behaviour is identified, LIA will decide on a further course of action, either through our disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, the case will be referred to LADO.

LIA's Safeguarding Policy Check List

Creati on Date	Review Date	Versio n	Director
08/201 8	10 April 2023	2023.04 (1.5)	Krestyna Huggins

Date of check list : 1st December 2017

A child protection policy states the organization's commitment to safeguard children

The organization has a child protection policy	The policy is written in a clear and easily understood format for staff, children, homestay hosts and their families.
	The policy is publicized, promoted and distributed to relevant audiences.
	The policy is approved and endorsed by the course management team.
	The policy is mandatory for LIA staff and homestay hosts.
	The policy is reviewed every year or whenever there is a major change in the organization or in relevant legislation or guidance.

Child Protection procedures: what to do if there are concerns about a child's welfare

There are clear procedures which provide step-by-step guidance on what action to take if there are concerns about a child's safety or welfare.	The child protection procedures are available to all (including children and their parents) and actively promoted on joining the organization. Consideration is given to language, difference ways of communicating and ease of use.
	There is a designated person with a defined role and responsibilities in relation to child protection which is appropriate to the level at which she operates.
	There is a process for recording incidents, concerns and referrals and storing these securely in compliance with relevant legislation.
	There is a process for dealing with complaints by parents and children about unacceptable behavior towards children.
	There is guidance on information sharing which clearly states the welfare of children is the most important consideration.

Prevention: safe recruitment of staff and volunteers

There are rigorous policies and	All those who have significant contact with children are subject to safeguarding checks as required by guidance and these are properly recorded.
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procedures for recruiting staff and homestay hosts who have contact with children.	There are well publicized ways in which staff, homestay hosts and their families, parents and children can raise concerns about unacceptable behavior by anyone within the organisation. These include external contacts such as NSPCC and ChildLine.
	An assessment of risk of any activities and the environment in which they take place is made prior to commencement and action taken to minimise risk.
	A risk assessment is in place for transporting children or for taking them away on trips.
	Operating standards are set out to ensure children are adequately supervised at all times.
Codes of practice and behavior	
There are well–publicised codes of behavior for which all staff and homestay hosts comply.	The organization provides guidance on expected standards of behavior by adults towards children and young people.
	There is guidance on expected behavior by children towards other children.
	There are processes for dealing with behavior that is not acceptable.
	All disciplinary measures/sanctions are non violent and do not involve humiliating children and young people.
	Managers and senior staff promote a culture that ensures children are listened to and respected as individuals.
	The consequences of breaching the code are clear and linked to disciplinary and grievance procedures.
Equality and inclusion	
The safeguarding policy makes it clear that all children have equal rights to protection	The safeguarding procedures, guidance and training help staff and homestay hosts to recognize the additional vulnerability of some children and the extra barriers they face to getting help, because of their race, gender, age, religion, sexual orientation, social background and culture.
	Codes of conduct/behavior make it clear that discriminatory, offensive and violent behavior is unacceptable and that complaints will be acted on.
Communication	
Information about the organisation's commitment to safeguard children	Information for young people and for parents is made available about where to go for help in relation to child abuse.
	Information is provided in a format and language that can be easily understood by all service users.

and young people is openly displayed and available to all.	Everyone in the organization knows who the designated person for child protection is and how to contact them.
	Contact details for children's social care, police and emergency medical help and child help lines are readily available.

Education and Training

	There is an induction process for all LIA staff and homestay hosts that includes familiarization with the LIA safeguarding policy and procedures.
	All staff and homestay hosts are provided with opportunities to learn about how to recognize and respond to concerns about child abuse.
	Staff with special responsibilities in relation to safeguarding have training to enable them to develop the necessary skills and knowledge and have regular opportunities to update their knowledge and understanding.
	Training and written guidance on safe recruitment is provided for those responsible for recruiting and selecting staff and homestay hosts.

Advice and Support

	Designated child protection staff have access to specialist advice, training support and information.
	Children are provided with information on where to go for help and advice in relation to abuse, harassment and bullying, or significant difficulties in the homestay or their own homes.
	There are arrangements for providing regular supervision and support to staff and homestay hosts and particularly during and following an incident or allegation of abuse or a complaint.

Evaluation

Plans are in place to evaluate the effectiveness of the safeguarding measures.	Arrangements are in place to monitor and evaluate the child protection procedures and the safe recruitment procedures.
	The resources essential for implementing the plan are made available.
	Practices are reviewed at stated intervals, at least every year.
	All incidents, allegations of abuse and complaints are recorded and monitored.

LIA's Travel Risk Assessment

Creation Date	Review Date	Version	Director
08/2018	10 April 2023	2023.04 (1.5)	Krestyna Huggins

What are the hazards	Who might be harmed and how	What we are already doing	Do we need to do anything else to manage this risk?	Action by who?	Action by when?	Complete
Traffic accident	Children and Homestay Hosts	<p>For taxi transfers plenty of time is allowed between pick up and airport check-in so drivers do not need to rush.</p> <p>If we receive reports of poor or dangerous driving we will refuse to use the same driver again. If this happens more than once we will no longer use that taxi company.</p> <p>All homestay hosts are advised to leave plenty of time to arrive at the airport to avoid rushing.</p> <p>Homestay hosts are not obliged to provide transfers if they do not feel confident in driving to major airports.</p> <p>We provide a 24 hour assistance number to all children, homestay hosts and taxis in case of an emergency.</p> <p>All drivers are DBS checked, fully licensed and insured.</p>				

		Information on how to contact the emergency services in the UK is provided to children before they travel.				
Wrong child being collected Child getting into wrong taxi	Children under 18	<p>A welcome sign is provided to all drivers (taxi and homestay hosts) bearing the child's name so children can identify their driver. All children are sent a copy of the welcome sign so they know what to look for.</p> <p>All children are sent a detailed transfer confirmation with the full details of the person / company meeting them.</p> <p>Taxi companies have signed a service agreement to confirm they will use the LIA welcome sign when collecting children.</p> <p>Children are issued with a Travel Safe document containing information on how to stay safe when travelling alone.</p> <p>We provide a 24 hour assistance number to all children, homestay hosts and taxis in case of an emergency.</p>				

Lost documents	All children	<p>All children are advised to keep their documents in a safe place when travelling.</p> <p>LIA has contact numbers for airports to try to trace any lost documents.</p> <p>We provide a 24 hour assistance number to all children, homestay hosts and taxis in case of an emergency.</p> <p>Children are issued with a Travel Safe document containing information on what to do if they lose their documents/ bank card.</p>				
Lost luggage	All children	<p>LIA has contact numbers for airports to try to trace any lost luggage.</p> <p>We provide a 24 hour assistance number to all children, homestay hosts and taxis in case of an emergency.</p> <p>Children are advised to carry in their hand luggage any essential medication.</p>				
Adverse weather conditions	All children	<p>We provide a 24 hour assistance number to all children, homestay hosts and taxis in case of an emergency.</p> <p>We have a network of homestay hosts throughout the UK available to host children if they are stranded due to poor weather.</p>				
Delay or issues at Immigration	All children	<p>We provide all children with the necessary documentation for immigration purposes.</p> <p>We provide children with clear travel instructions including a list of documents they must bring with them on arrival.</p> <p>We have a copy of these documents easily accessible on file by the duty person should immigration need a copy.</p> <p>A LIA representative (homestay hosts or driver) will be waiting in arrivals for children under 18.</p>				
Risk of exposing	Children under 18	All homestay hosts and taxi drivers are required to have a full DBS check.				

child to danger from unknown adults		We provide a 24 hour assistance number to all children, homestay hosts and taxis in case of an emergency				
Missing Child	All children	Emergency contact numbers for parents and agents so can check if travel plans have changed.				

LIA's Travel Risk Assessment (Children travelling independently) 10a

Creation Date	Review Date	Version	Director
08/2018	April 2023	2023.04 (1.5)	Krestyna Huggins

What are the hazards	Who might be harmed and how	What we are already doing	Do we need to do anything else to manage this risk?
Risk of any of the above incidents occurring with no LLE assistance at the airport / port / train or bus station.	Children under 18	We provide a 24 hour assistance number to all children in case of an emergency. However, LIA assistance will be limited if travel arrangements have been made privately. Children will be liable for any expenses incurred by LIA assisting with emergency travel arrangements (e.g. taxi bookings, public transport fees, emergency accommodation). We reserve the right to charge an additional administration fee for the extra work.	Follow LIA Travel Policy - all under 17s should book an LIA transfer
Missing the booked bus / train	Children under 18	We provide a 24 hour assistance number to all children in case of an emergency. However, LIA assistance will be limited if travel arrangements have been made privately. Children will be liable for any expenses incurred by LIA assisting with emergency travel arrangements (e.g. taxi bookings, public transport fees, emergency accommodation). We reserve the right to charge an additional administration fee for the extra work.	Follow LIA Travel Policy - all under 17s should book an LIA transfer
Arrival flight is re-routed to a different UK airport (usually due to weather)	Children under 18	We provide a 24 hour assistance number to all children in case of an emergency. However, LIA assistance will be limited if travel arrangements have been made privately. Children will be liable for any expenses incurred by LIA assisting with emergency travel arrangements (e.g. taxi bookings, public transport fees, emergency accommodation). We reserve the	Follow LIA Travel Policy - all under 17s should book an LIA transfer

		right to charge an additional administration fee for the extra work.	
No credit / battery on mobile phones to make calls in an emergency	Children under 18	Advising children to always travel with a fully charged mobile phone and with sufficient credit to be able to make calls in an emergency.	Follow LIA Travel Policy - all under 17s should book an LIA transfer
Child having insufficient English to cope with an incident whilst travelling	Children under 18	Any child whose English is not of a standard to be able to deal with any incident whilst travelling alone must book an LIA transfer.	Follow LIA Travel Policy - all under 17s should book an LIA transfer
Child having insufficient money or a credit card to cover any unforeseen incidents.	Children under 18	We provide a 24 hour assistance number to all children in case of an emergency. However, LIA assistance will be limited if travel arrangements have been made privately. Children will be liable for any expenses incurred by LIA assisting with emergency travel arrangements (e.g. taxi bookings, public transport fees, emergency accommodation). We reserve the right to charge an additional administration fee for the extra work.	Follow LIA Travel Policy - all under 17s should book an LIA transfer
Bus / Train is delayed or cancelled—engineering works, strikes, unforeseen incidents	Children under 18	We provide a 24 hour assistance number to all children in case of an emergency. However, LIA assistance will be limited if travel arrangements have been made privately. Children will be liable for any expenses incurred by LIA assisting with emergency travel arrangements (e.g. taxi bookings, public transport fees, emergency accommodation). We reserve the right to charge an additional administration fee for the extra work.	Follow LIA Travel Policy - all under 17s should book an LIA transfer
Getting on the wrong bus / train	Children under 18	We provide a 24 hour assistance number to all children in case of an emergency. However, LIA assistance will be limited if travel arrangements have been made privately. Children will be liable for any expenses incurred by LIA assisting with emergency travel arrangements (e.g. taxi bookings, public transport fees, emergency accommodation). We reserve the right to charge an additional administration fee	Follow LIA Travel Policy - all under 17s should book an LIA transfer

		for the extra work.	
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Concerns about a child or a child makes a disclosure to you?

This is what you **MUST** do ...

1. Wellbeing

Ensure the child is not in immediate danger/harm. Encourage the child to explain and give more detail without the use of leading questions.

Ask Who, What, When and How? Be careful about **Why** – **DO NOT** let the child feel responsible or to blame. Let the child know that you must confidentially pass what they have told you on to a person that can help. It is the LAW.

If you concerned about the immediate well-being and safety of a child contact 999 IMMEDIATELY.

5. Be Robust, Persistent and Escalate if needed.

You have the right to escalate your concern if you are not satisfied with the outcome of your concern, contact the Borough of Windsor and Maidenhead Referral and Assessment Team - Telephone number 01628 683150.

If you are concerned that the concern is not being handled to your expectation then call the NSPCC Whistleblowing helpline 0800 028 0285 or Childline on 0800 1111 IMMEDIATELY

3. Record

Guardians/Homestays:

Complete and email an incident report or record of concern. This must be within 24 hours, unless informed otherwise by LIA, and include full details of the child and disclosure/concern.

Volunteers and Visitors:

Record the following information

- Date, place, time
- Concern
- All facts
- Observed injuries
- Words of child

Sign and give to a member of LIA within 1 hour of the disclosure/concern. See Step 2 for details of who to contact.

4. Trust & Wellbeing

Allow LIA time to address concerns.

A disclosure can affect the child in ways that we need to prepare for.

Keep the child under close observation until told to stop by a health care professional. Comfort the child as is appropriate.

Going above and beyond the normal reward and well-being guidelines to comfort a distressed child is suggested.

Know you have done all you can in keeping the child safe! Speak to LIA or the NSPCC (details above) if the disclosure has affected you in any way.

2. Report

Contact London International Agency (LIA) within 1 hour of the disclosure/concern.

Krestyna Huggins
Principal of LIA
+44(0)7795 107532
london.int.agency@btinternet.com



Record of Concern (ROC) in Relation to a Child's Wellbeing or Safeguarding Issues

Child's Name:		Date of Birth:		Borough:	
Lead Professional (School or LIA):		Main Contact (External):			

Issues to consider when deciding on actions:

<ul style="list-style-type: none"> Does the concern suggest harm or likelihood of harm? Seek consultation with Safeguarding Children Service or make a referral to Social Care. Is the child already known to Social Care or another agency? Should this concern be shared with that agency? 	<ul style="list-style-type: none"> Is this a one-off incident or is there a history or pattern to the concerns? Should the issue be addressed directly with the child? Are additional interventions indicated? If so refer to Therapy Team. Should a TAC, EARM or CAF be convened?
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Reported to (please indicate as appropriate and date first contact):

Principal:		Parent:		SLT:		Therapy:		CAMHS:		Social Services:		Other:	
Date:		Date:		Date:		Date:		Date:		Date:		Date:	

Date:	Reported by:	Concern or Issue:	Is this a safeguarding issue?	Outcome of discussion with parent:	Actions taken (include contact details and dates):



Name of child

Medical Information:

- Life threatening Conditions
- Allergies
- Medication
- Personal Care needs

Sensory Issues including diet:

- Dislikes noise
- Will eat all food
- Moderate eating – no second helpings unless physically active

Likes to:

- Play with Lego
- Reading a book about Vampires
- Talk about Star Wars

D.O.B: 10/06/2000
School: Kings College
Year: 10



Rewards:

Languages and Learning Needs:

- Fluent in Russian and Ukrainian
- Has conversational English, German and French
- Wears reading glasses

Communication and Social Interaction:

- Dislikes being interrupted
- Dislikes being challenged in front of others

Does not like to:

- Others breaking the school rules
- Being forced to do something

(Version 1.0 Update 10/03/2017 with updates made in November 2017 [page 6])

If you require further information contact Krestyna Huggins, the Director London International Agency.

Adoption Date	Review Date	Director
08/2018	10 April 2023	Krestyna Huggins