



Study Links Safeguarding and Child Protection Policy

Reviewed By:

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Statement of Purpose

The purpose of this policy is to help create a safe and positive environment for children, it also clarifies what is required of Study Links, in relation to the protection of children.

This policy helps to demonstrate Study Links' commitment to safeguard children from harm, whilst deterring those who would wish to abuse children from joining Study Links. It sets out standards of behaviour expected at Study Links, and what to do if they notice, or are told about inappropriate behaviour.

The welfare of children at Study Links is paramount, every employee is committed to do everything possible to ensure that children are protected from harm at all times. This policy also provides a basis of protection for Study Links employees and persons acting on behalf of Study Links.

Study Links Designated Safeguarding Lead

Study Links' Child Protection Co-ordinator / Lead Safeguarding Officer / Designated Safeguarding Lead (DSL) / Prevent Lead is Ailie Fan who can be contacted on: director@studylinks.co.uk and 01274 679710.

If you are unable to reach Ailie Fan, you can contact the deputy, Jodie Driver on: jodie@studylinks.co.uk and 01274 679710.

Study Links 24-hour emergency contact number is +441274 924055.

Henceforth in this document Study Links Designated Safeguarding Lead will be referred to as the SLDSL.

DSL Role and Responsibilities

SLDSL, and the deputy (where appropriate) are responsible for and/or expected to:

- Being conversant with all legislation including regulations relevant to the law of Child Protection.
- Holding and being fully conversant with the Guidance and Regulations of the Children Act 1989, or any legislation subsequent to that Act.
- Briefing guardianship personnel on the contents of the guidance and procedures and on the procedures. This includes the briefing of new guardianship personnel as part of their induction after joining Study Links.
- Ensuring the procedures below are followed within Study Links.
- Liaison over child protection procedures with the Social Services Department.
- Take lead responsibility for safeguarding and child protection (including online safety).
- Receiving reports of alleged or suspected child abuse within Study Links or reported by a child relating to incidents at home or outside Study Links, contacting where appropriate the relevant local Safeguarding Partners and taking other action in response, as set out below.
- Ensuring that all records of concern about a child, even if there is not a need to take any immediate action, are kept confidentially and securely.
- Refer cases of suspected abuse to the local authority children's social care as required;

- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.
- Liaise with guardianship personnel on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- Act as a source of support, advice and expertise for all guardianship personnel.

List of Supporting Policies

In addition to *Study Links Safeguarding and Child Protection Policy*, the following supplementary policies have been created to ensure the safety and wellbeing of Study Links students.

- Anti-Bullying Policy
- Complaints Policy
- Data Protection Policy
- Discipline, Sanctions, and Restraint Policy
- Absent and Missing Student Policy
- Prevent Policy
- Safe Use of Internet Policy
- Whistleblowing Policy

The supporting policies included in this list are available to all Study Links guardianship personnel, homestays, parents, students, and any other parties relevant to the safeguarding of its students.

Definitions and Terminology

The Legal definition of a child is a person under the age of 18 as outlined in the Children's Act 2004. Study Links accommodates students of a range of ages and is AEGIS accredited and matches the requirements of the British Council for being a service provider and placement organiser to international students of all ages studying in the UK.

Terminology

- *Safeguarding children* is defined in [Working together to safeguard children](#) as:
 - protecting children from maltreatment
 - preventing impairment of children's health or development
 - ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
 - taking action to enable all children to have the best outcomes
- For the purposes of this policy, all references to '*child*' or '*children*' - whether singular or plural – are used and are taken to refer to students enrolled at a school or other

educational institution in the United Kingdom who are in the care of Study Links.

- *'Child protection'* is used to cover all levels of harm to all students, not just serious harm.
- *'Guardianship Organisation'* or **STUDY LINKS INTERNATIONAL LTD** (Study Links) are used and are taken to refer to the company or organisation or individual employed by parents to be the Educational Guardians of a child in the UK.
- *'Guardianship personnel'* means an educational guardian having any responsibility for a child as defined in the contract during that contractual period. This may also refer to any personnel at Study Links, whether paid or unpaid, whether under a contract of service or apprenticeship, under a contract for services, or otherwise than under a contract, who has similar responsibility for a child and may be interacting with children for or on behalf of Study Links. The normal duties of guardianship personnel include caring for, supervising or being in sole charge of children; they also involve unsupervised contact with children under arrangements made by a responsible person.
- A *'safeguarding partner'* in relation to a local authority area in England is defined under the Children Act 2004 as: (a) the local authority, (b) a clinical commissioning group for an area any part of which falls within the local authority area, and (c) the chief officer of police for an area any part of which falls within the local authority area. The three safeguarding partners should agree on ways to co-ordinate their safeguarding services; act as a strategic leadership group in supporting and engaging others; and implement local and national learning including from serious child safeguarding incidents. To fulfil this role, the three safeguarding partners must set out how they will work together and with any relevant agencies as well as arrangements for conducting local reviews.

Definitions of Abuse

Study Links ensures everyone is aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children. Types of abuse, neglect and safeguarding issues include:

The latest version of "Keeping Children Safe in Education" (KCSIE) outlines various types of abuse and neglect, providing definitions, common signs, and symptoms to help educators identify and respond to potential cases. Below is an up-to-date list based on the latest guidance:

Physical Abuse

- **Definition:** Physical abuse involves causing physical harm to a child. This may include hitting, shaking, throwing, poisoning, burning, drowning, or suffocating. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

- **Signs and Symptoms:**

- Unexplained injuries, bruises, burns, or fractures
- Fear of physical contact or flinching when approached
- Aggressive behaviour or extreme passivity
- Wearing long sleeves or covering up even in warm weather

Emotional Abuse

- **Definition:** Emotional abuse is the persistent emotional maltreatment of a child, leading to severe and adverse effects on the child's emotional development. It may involve conveying to the child that they are worthless or unloved, or deliberately making them feel frightened. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including [cyberbullying](#)), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

- **Signs and Symptoms:**

- Developmental delays in speech or other milestones
- Low self-esteem or self-worth
- Extreme anxiety or depression
- Inappropriate emotional responses (e.g., overly aggressive or passive)
- Social withdrawal or lack of attachment to parent/carer

Sexual Abuse

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

- **Signs and Symptoms:**

- Inappropriate sexual behaviour or knowledge for the child's age
- Physical signs such as bruising, bleeding, or pain in genital areas

- Sudden changes in behaviour, including withdrawal or aggression
- Fear of being left alone with certain individuals
- Sexually transmitted infections (STIs) or pregnancy

Neglect

- **Definition:** Is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Signs and Symptoms:**
 - Poor hygiene, dirty clothing, or severe body odour
 - Untreated medical conditions or injuries
 - Consistent hunger or stealing food
 - Frequent absenteeism from school
 - Lack of appropriate supervision, leading to accidents or injuries

Child Sexual Exploitation (CSE)

- **Definition:** Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or 10 females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.
- **Signs and Symptoms:**
 - Unexplained gifts, money, or new possessions
 - Association with older individuals or groups
 - Sudden changes in behaviour or school performance
 - Misuse of drugs or alcohol
 - Frequent absences from home or school

Child Criminal Exploitation (CCE)

- **Definition:** Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or 10 females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.
- **Signs and Symptoms:**
 - Unexplained absences from school or home
 - Possession of unexplained items or money
 - Association with gangs or involvement in illegal activities
 - Frequent travel to unfamiliar locations
 - Fear of law enforcement or reluctance to speak out about activities

Domestic Abuse

- **Definition:** Domestic abuse refers to any incident of controlling, coercive, threatening behaviour, violence, or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. Witnessing domestic abuse can be extremely harmful to children.
- **Signs and Symptoms:**
 - Aggressive, disruptive, or antisocial behaviour
 - Physical injuries or a history of frequent injuries
 - Anxious, fearful, or overly cautious behaviour
 - Displaying signs of trauma or PTSD
 - Difficulties in forming relationships or attachment issues

Child-on-Child Abuse

- **Definition:** All children can abuse other children (often referred to as child-on-child abuse). This is most likely to include, but may not be limited to:
 - bullying (including cyberbullying);
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexual violence such as rape, assault by penetration and sexual assault
 - sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse

- upskirting which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - sexting (also known as youth produced sexual imagery)
 - initiation/hazing type violence and rituals
- **Signs and Symptoms:**
 - Sudden changes in behaviour, such as becoming withdrawn or aggressive
 - Avoidance of certain friends or activities
 - Unexplained injuries or reluctance to discuss certain incidents
 - Signs of anxiety, depression, or self-harm
 - Possession of explicit images or involvement in online bullying

Female Genital Mutilation (FGM)

- **Definition:** FGM is a procedure where the female genitals are deliberately cut, injured or changed, but there's no medical reason for this to be done. It's also known as female circumcision or cutting, and by other terms, such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.
- **Signs and Symptoms:**
 - Pain, bleeding, or infection in the genital area
 - Difficulty walking, sitting, or standing
 - Prolonged absence from school with noticeable behaviour change on return
 - Reluctance to undergo medical examinations
 - Talking about a "special procedure" or event

Modern Slavery and Human Trafficking

- **Definition:** Modern slavery includes human trafficking, where individuals are forced, deceived, or coerced into working or other forms of exploitation.
- **Signs and Symptoms:**
 - Unexplained absence from school
 - Fear of authorities or unwillingness to talk about their situation
 - Appearing malnourished or physically unwell
 - Lack of personal possessions or financial control
 - Accompanied by an adult who appears controlling or does not let the child speak for themselves

Radicalisation

- **Definition:** Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Signs and Symptoms:**
 - Expressing extreme views or advocating violence

- Isolation from peers or family
- Increased secrecy, especially regarding online activities
- Association with known extremists or extremist groups
- Sudden changes in religious practices or attire

These types of abuse and neglect are not exhaustive but represent the primary categories outlined by the latest KCSIE guidance. Study Links guardianship personnel are required to remain vigilant, report concerns, and work closely with safeguarding leads to ensure the safety and well-being of children in their care.

A full list of government definitions of abuse, neglect and safeguarding issues and further details on what to look out for and how these must/should be reported, can be found on the [official government website](#)

Child Protection Guidelines

At Study Links, we acknowledge that the welfare of the child is paramount and that regardless of gender, age, disability, racial heritage, religious belief, sexual orientation or identity, all children have equal right to protection from all harm and abuse.

Study Links Commitment to Child Safety and Welfare

Study Links understands the importance of protecting children from all types of abuse and is committed to protecting all children by:

- Recognising that child protection is not only a legal obligation but also an organisational and individual's responsibility.
- Creating policies and procedures to comply with all regulatory requirements and guidelines
- Reviewing policies and procedures on an annual basis.
- Training guardianship personnel to an appropriate level of awareness regarding the safeguarding of children.
- Alerting guardianship personnel and homestays to the fact 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 abusive or harmful.
- Encouraging guardianship personnel and homestays to have a professional curiosity regarding concerns they may have relating to students
- Ensuring guardianship personnel and homestays know they are free to speak to the DSL whenever they have concerns about a child.
- Making all policies and procedures available to all employees, homestays, and other relevant parties.
- Ensuring a child's wishes and feelings are taken into account whenever a safeguarding concern or potential safeguarding concern is identified.
- Having guidelines for responding appropriately if abuse of a child is alleged, disclosed, discovered, or suspected. Study Links encourages openness about concerns relating to child protection matters, because child abuse thrives on secrecy.
- Liaising with the appropriate parties related to any safeguarding issue. This may include the student, parents, education agent, school, homestay, and/or official

safeguarding agencies. Guidelines in this policy explain what should be done about those concerns.

Keeping Children Safe

Lines of Communication with Study Links

Who should you speak to if you believe there is a problem? If you are able you should speak with SLDSL, or their deputy.

If a child has disclosed anything to you, then you need to advise SLDSL, as soon as you are able.

If you are at all concerned about a child you can speak directly to the Local Safeguarding Partner relative to where the student is living (see details in APPENDIX 1: List of UK Safeguarding Children Partnerships). If for any reason the number is not working, please use the internet and search for the most up to date contact number. If you have contacted a local Safeguarding Partner directly, please also speak to SLDSL as soon as you are able.

Parents, in a similar way, should report alleged abuse to one of the guardianship personnel or the SLDSL at Study Links or one of the house guardianship personnel at school, depending on whom the alleged abuser is.

Any person responsible for the welfare of a child has a duty under English law to report any suspicions of abuse to the relevant authority.

Responding to Suspicions of Abuse or Safeguarding Concerns

Any employee of Study Links who is told of any incident or has strong suspicion of any abuse must report the information to the SLDSL. (In the absence of the SLDSL, an immediate report should be made to the deputy).

If a child or group of children disclose the fact that they are upset or worried, or if a child or group of children give the appearance of being upset, every effort should be made to keep the individual or group of individuals calm and not distressed. It is not appropriate to try to force conversation whilst there is an emotive atmosphere. The individual(s) concerned should be taken to a private place where, if the situation warrants it, a second responsible adult should be asked to be present. The following guidelines should be observed:

- Confidentiality should never be guaranteed. Study Links employees or anyone acting on behalf of Study Links should guarantee only that they will pass on information to the minimum number of people who must be told to ensure that the proper action is taken to sort out the problem, that they will never tell anyone who does not have a clear 'need to know' and that they will personally take whatever steps they can to protect the informing child/children or guardianship personnel from any retaliation or unnecessary stress that might be feared after a disclosure of alleged abuse has been made.
- Any questioning should be limited to the minimum necessary to seek clarification only, strictly avoiding 'leading' the child or adult who has approached them by making suggestions or asking questions that introduce their own ideas about what may have happened. (Questions such as, 'Did he do X to you?' should not be used; instead a minimum number of questions of the 'Tell me what happened?' type may be asked.)

- The alleged perpetrator should not be criticised because the child's emotions may already be horribly mixed. The child should not be asked to repeat everything that s/he has already disclosed to another member of the guardianship personnel.
- As soon as the child or adult has disclosed that he or she believes that something abusive has happened to him or her, or to someone else, no further questions should be asked of him or her. Further questioning could cause more damage and prejudice possible criminal proceedings.
- The informing child or adult should be asked what steps s/he would like taken to protect him/her now that the allegations have been made and should be given an assurance that Study Links will try to follow these wishes.
- The matter should be referred immediately, with all relevant details, to the SLDSL at Study Links.
- The adult to whom the disclosure has been made should make a written record as soon as possible of what s/he has been told. The record should not include the writer's own assumptions and interpretations but solely what s/he has heard and seen. Original notes should not be destroyed, even if the record may be written up more neatly and fully at a later stage. The record should comprise dates, times, places, plus any non-verbal behaviour as well as words used, including sexual words (if any used). If injury is apparent, a diagram should be appended in order to give exact location.
- An allegation of abuse should never be discounted simply on the grounds of the child's location or because the alleged abuser is someone well known to and trusted by the individual to whom the disclosure has been made.

Action by Study Links

When the SLDSL receives an allegation of abuse they should:

- take any steps needed to protect any child involved from risk of immediate harm. Furthermore, Study Links should take any necessary steps for the longer-term protection and support of each child who has made allegations of abuse, or who is alleged to have suffered from abuse, taking his or her wishes fully into account. This may involve the child receiving continuing support and protection from the guardianship personnel chosen by him or her, or changing accommodation, or returning to his or her parents temporarily.
- refer to the local safeguarding partner's threshold for reporting (as Local authorities do not necessarily share the same thresholds for reporting), and follow their specific guidance, involving LADO if appropriate.
- Not interview or investigate the allegation further but refer the matter immediately to the Children's Social Services at the local Social Services office. Study Links should speak personally to the Duty Team Leader and not rely on leaving a message.
- consult with the Duty Team Leader regarding contacting parents, agent (where appropriate), other guardianship personnel, police, doctor or the alleged perpetrator or witnesses directly. Whilst Study Links has a duty first and foremost to the child, it must at all times respect the rights of parents and keep them informed of all matters relating to the child.
- contact the Team Manager in the Social Services Department (SSD) who will initiate an independent investigation if this proves to be necessary. The Team Manager will arrange, within pre-set limits, the involvement of the relevant specialist police personnel and, if necessary, a meeting of the agencies who may need to be involved, together with Study Links.
- inform the child or guardianship personnel who made the initial allegation of what the next steps are to be, having agreed these with the Team Manager. It is helpful for the

call to the Team Manager to be made while the child or adult is in attendance, so that he or she can be told the likely next steps immediately after the call.

- inform the Head teacher or suitable Safeguarding Lead of the school the child is attending (unless s/he is the subject of any of the allegations or suspicions) of the allegation and the action as taken above and, if the allegation is concerning an incident within the School context, agree necessary further action in line with these standards.
- if necessary, cease to use, pending investigation, any member of its guardianship personnel who is alleged to have abused a child or children. Study Links will not hesitate to cease to use any member of the guardianship personnel, without prejudgement of guilt and as a precautionary measure, where there is a concern about possible abuse.
- take any necessary steps to protect and support a child who is alleged to have abused another and inform his/her parents immediately.
- ensure that any child being interviewed by the police has available supportive guardianship personnel of his or her own choice to accompany him or her if this becomes necessary.
- make arrangements, where feasible, for any child who has been the subject of abuse to receive any necessary continuing counselling and support, by agreement with his or her parents where appropriate.

Responding to Child-on-Child Allegations

Study Links recognises that physical and sexual violence and harassment can occur between children and within peer groups and is committed to responding swiftly and appropriately within an effective safeguarding framework.

Taking this into account:

- Any direct disclosure of abuse by a student should be taken seriously, handled sensitively, with basic principles in mind: listen carefully, reassure, avoid leading questions, and do not guarantee confidentiality.
- All incidents should be addressed in accordance with Study Links' Safeguarding and Child Protection Policy, as well as the School's Safeguarding Policy where applicable. The incident must be referred to the DSL immediately, and the student's school should be notified without delay.
- The DSL should consult with the Deputy Safeguarding Lead and liaise with the school's safeguarding representatives and the involved students as needed. The DSL will determine if additional information is needed to decide the best response, coordinating with the student's School Safeguarding Representative.
- For incidents involving students not under Study Links' care, the DSL will decide whether to contact the relevant guardian agency, college, school, or individual. The DSL may consult with Children's Social Care to ensure the safety and welfare of all involved, including the student accused of abuse. If a student is to be interviewed by the police, an appropriate adult will provide support during the interview.
- The DSL will assess the risk to the involved students and, in consultation with the school, decide whether a referral to the police or Local Area Designated Officer (LADO) is necessary, or whether to proceed with the school's pastoral and disciplinary systems.
- Parents should be informed early in the process unless there is a valid reason to believe this would put the young person at risk.

- If there is any concern that a young person has been harmed or is at serious risk of harm, a referral should be made to Children's Social Care. Any staff member can make this referral but must inform the DSL as soon as possible.
- All conversations and meetings related to child-on-child abuse will be documented. Complete formal written records immediately or within 24 hours, including date, time, place, individuals involved, nature of the disclosure, and relevant details. These should be emailed to the DSL using Study Links' reporting forms.
- The DSL will provide ongoing support in the best interests of Study Links students and may coordinate actions if a broader investigation involves Children's Social Care and/or the Police.

Responding to Allegations of Abuse Against Anyone Working with or For Study Links.

Following investigation, Study Links should consider taking, and if necessary and appropriate, should take the necessary measures to safeguard the child against any member of the guardianship personnel or of his/her household, where it believes children are at risk of abuse from that member of the guardianship personnel or of their household, even in cases where there may be no criminal prosecution. Cessation from a role within the guardianship personnel (without prejudice) may be necessary to protect all concerned, including the guardianship personnel or his/her household member.

Study Links must make its own decision on whether a child's welfare is at risk, whatever the outcome of a police or Social Services Department investigation may be. The level of evidence needed for criminal prosecution is likely to be higher than that which may trigger valid and appropriate precautionary proceedings taken by Study Links.

Appropriate precautionary proceedings and grounds for concern over its children's welfare may therefore be based on 'balance of probability', rather than on evidence 'beyond reasonable doubt'.

In any instance of an allegation of child abuse Study Links will, after reasonable investigation and if satisfied on a balance of probabilities that there is substance to the allegation, immediately terminate any contract or other arrangement with that member of the guardianship personnel or other person. Study Links has a duty to terminate any possible contact between the child and that person.

Where an allegation is made against anyone working or volunteering with or for Study Links that involves the abuse of a child, the Designated Safeguarding Lead must report the concern immediately to the Local Authority Designated Officer (LADO), in line with statutory guidance. This ensures appropriate oversight and independent management of the allegation. For more detail on this process, see the 'Action by Study Links' section on page 13.

Low-Level Safeguarding Concerns

A 'low-level' concern is not insignificant. It refers to any concern, no matter how small or subtle, that suggests someone (adult or child) may have acted in a way that:

- Raises professional curiosity

- Is inconsistent with the staff code of conduct, including inappropriate behaviour outside of work
- Does not meet the harm threshold or is not serious enough for a referral to LADO

Examples include:

- An adult being overly friendly with children
- A staff member showing favouritism
- Taking unauthorised photos of children on a mobile phone
- Engaging one-on-one with a child in a secluded area or behind a closed door
- Humiliating a peer or child

Such behaviours can range from thoughtless actions or misunderstandings to those that may eventually enable abuse.

Low-level concerns can arise from various sources, such as suspicion, complaints, or disclosures by a child, parent, or other adults inside or outside of Study Links, or through vetting checks.

It is essential to share all low-level concerns with the appropriate person, ensuring they are recorded and managed properly. Addressing these concerns effectively also helps protect staff from potential false accusations or misunderstandings.

Study Links achieves this by:

- Ensuring staff understand and follow the Staff Code of Conduct
- Encouraging the reporting and sharing of any concerns
- Addressing unprofessional or inappropriate behaviour immediately
- Highlighting any gaps in Study Links' safeguarding policies

Any concern should be reported to the Senior Lead Designated Safeguarding Lead (SLDSL) or the Deputy DSL.

The DSL will determine whether it is a low-level concern but may escalate it to LADO if it meets the harm threshold as per the Safeguarding Policy.

If a pattern of behaviour emerges, Study Links will take further action, either through disciplinary procedures or by referring the case to LADO if the pattern escalates to meet the harm threshold.

Self-Reporting Safeguarding Concerns

Study Links encourages all staff and homestays to self-report to Study Links any situation which could appear compromising or be misconstrued, or where their behaviour has fallen below the standards required in the Study Links' code of conduct. If these instances should arise, Study Links will record and manage these in line with pre-set policies and procedures. Study Links will self-report to AEGIS any significant safeguarding concerns or situations which could appear compromising or be misconstrued, as well as any behaviour which has fallen below expected standards.

Supporting Students with a Mental Health Concerns

When supporting students presenting with mental health issues, Study Links staff, volunteers, and homestays should refer to the Mental Health Policy and ensure the welfare of the student is the highest priority. This policy is available on the Policy page of our website.

Records

- Concerns of a serious nature communicated to the SLDSL will be responded to on the same day.
- All concerns (both low-level and serious) are documented, noting the details, context, and actions taken. The identity of the person reporting the concern will also be recorded unless anonymity is requested, which will be respected as much as possible. Records are securely stored in compliance with the Data Protection Act 2018 and UK GDPR.
- Access to any safeguarding records are only available to the SLDSL, relevant Study Links guardianship personnel deemed necessary to promote the welfare of Study Links' students, and any official outside agent as appropriate.
- If an allegation is made against a Study Links guardianship personnel member, homestay, or associated party, details of the allegation must always stay on a person's confidential file including a summary of the allegation, how the allegation was followed up and resolves and a note of any action taken and decisions reached.

Safeguarding Training of Study Links Employees and Homestays

Study Links complies with local Safeguarding Partners (established by the Children Act 2004 and amended by the Children and Social Work Act, 2017), which gives statutory responsibility to each locality to have in place a mechanism whereby each local Safeguarding Partner ensures that key agencies work together to keep children safe.

Local Safeguarding Partners are also key to supporting and enabling Study Links to adapt their practice and become more effective in safeguarding children.

For these reasons, Study Links has established and maintains links with its local Safeguarding Partner: The Bradford Partnership.

Safeguarding training for all guardianship personnel, volunteers and homestays is updated regularly:

- Level 3 training is provided by [sacpa](#) (Safeguarding and child protection association) – compulsory for SLDSL and their deputy.
- Level 1 training is provided by [AccreditationUK](#) – compulsory for guardianship personnel, volunteers and homestay families
- Prevent training is provided by the [UK Government](#) – compulsory for guardianship personnel, and highly recommended for homestay families
- [Bradford Council](#) also provide the requisite level of safeguarding and child protection training for Study Links where appropriate.

Code of Professional Conduct

Employees Responsibilities

At Study Links all employees abide by this policy which involves directly employed guardianship personnel, Study Links Student Support Representatives, Study Links Academic Consultants, homestay hosts, Guardian Support Representatives and volunteers or interns. All employees as listed are expected to read the policy and procedures set out and abide by them.

All employees must adhere to the policies involving the standards and behaviours as set out in this document. We ensure that a caring environment is implemented through set procedures and recruitment and training activities being in place.

At Study Links we expect all employees and others working with Study Links to be a role model to all students within their care to create a caring, safe and secure environment for all.

Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where adults fail to do so. All adults involved in Study Links provision of care should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of other adults.

All adults involved in Study Links provision of care to students should be aware that allegations and concerns will be investigated promptly and confidentially.

Allegations regarding potential breaches of this policy will be treated in confidence and investigated thoroughly. If guardianship personnel raise any concerns Study Links is committed to ensuring that they are protected from victimisation, harassment or less favourable treatment. Any such incidents will be dealt with under the Company's Disciplinary Procedures.

Study Links' Whistleblowing policy can be found in the list of supplementary policies at the beginning of this document.

Advice On One-To-One Contact with Children

Study Links employees and those working with Study links should be wary of placing themselves in situations where they are open to accusations of inappropriate conduct. Essentially this involves exercising common sense, however all Study Links employees are advised to maintain the following professional conduct;

- If in conversation with a child in a room or a car, for example, a respectful distance should be observed. Study Links employees, those working with or for including a member of their household should never be alone with the child in the bedroom with a closed door. If an adult member of their family is involved in corrective and

personal guidance of a child, it is advisable to take precautions: e.g., if inside the house, by leaving the door to the room open, remaining seated at a reasonable distance from the child, ensuring there is a witness when appropriate or that there is another responsible adult in the house where possible.

- It is not wise to invite a single child into a bedroom or bathroom. On occasions it will be unavoidable that a single child will be transported in a member of the Study Links personal vehicle. It is prudent on such occasions to ensure that the child passenger sits on the rear seat to reduce the possibility of accidental contact, which might be misconstrued.
- It is good advice not to make physical contact with a child. This is most important advice in a one-to-one situation between a member of Study Links and a child. Study Links employees and those working with Study Links should note that, in one-to-one discussions, confidentiality should not be promised to the child.
- Exclusively intimate situations with a child that could either arouse undue suspicion or lead to misinterpretation and false allegations should be avoided.

Appropriate Appearance

It is important that all employees and others working with Study Links should:

- Dress appropriately to their role
- Promote a positive and professional image
- Dress in a way that is not likely to be viewed as offensive, revealing or sexually provocative
- Dress in a way that is not considered to be discriminatory.

Alcohol, Drugs and Smoking

It is important that all employees and others working with Study Links should:

- Not consume or allow student under 18 to consume any alcohol, drugs, cigarettes or intoxicating substances.
- Not provide alcohol, drugs, cigarettes or intoxicating substances to students under 18.

IT and Social Networks

It is important that all employees and others working with Study Links should:

- Not share any personal social media details with any students.
- Not take any images or videos of any under 18 students without appropriate consent.

Accommodation

- Study Links employees must abide by the accommodation rules and guidelines.
- Study Links employees must not enter private areas without first gaining the students permission, or in the case of needing to search property without informing them first and doing so in their presence preferably with another employee present.

Transport

- Abide by the specific guidelines of your local centre.
- All transport providers, whether guardianship personnel or contractors to have appropriate suitability checks.

Supporting Policies

A list of key Study Links policies supporting our work is included below. All these policies can be found on the Policy page of our website:

- Absent and Missing Student Policy
- Anti-Bullying Policy
- Complaints Policy
- Discipline, Sanctions, and Restraint Policy
- Mental Health Policy
- Prevent Policy
- Privacy (Data Protection) Policy
- Safe Use of Internet Policy
- Whistleblowing Policy
- Emergency Plan

Review

Study Links Safeguarding and Child Protection Policy follows government and guardianship governing body guidelines to ensure the safety of children. This policy is reviewed annually taking into account any changes in legislation, best-practice or roles concerned throughout the year.

Further Information

- Keeping Children Safe in Education
https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf
- Keeping Children Safe (for young people)
<https://www.childrenscommissioner.gov.uk/wp-content/uploads/2017/07/Working-together-to-safeguard-children.pdf>

- Keeping Children Safe (for children)
https://www.childrenscommissioner.gov.uk/wp-content/uploads/2017/07/GUIDE_Young_Persons_Guide_to_Keeping_Children_Safe.pdf
- Working Together to Safeguard Children
https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf
- Safer Bradford
<https://www.saferbradford.co.uk/children/practitioners-who-work-or-volunteer-with-children-and-young-people/>
- Bradford Council
<https://www.bradford.gov.uk/children-young-people-and-families/safeguarding-children/safeguarding-children/>
- Government advice for parents and carers on cyberbullying:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/444865/Advice_for_parents_on_cyberbullying.pdf

APPENDIX 1: List of UK Safeguarding Children Partnerships

England

Safeguarding Children Partnership	Phone Number(s)
The Barking and Dagenham Safeguarding Children Partnership	020 8227 3578
Barnet Safeguarding Children Partnership	020 8359 4066 (MASH)
Berkshire West Safeguarding Children Partnership	Email: BWSCP@brighterfuturesforchildren.org
Barnsley Safeguarding Children Partnership	01226 772423 (Children's Social Care)
Bath and North East Somerset Safeguarding Children Board	01225 396111 (Children's Social Work Services)
Bedford Borough Council Safeguarding Children Board	01234 276346 (BBSCP Business Unit)
Bexley Safeguarding Partnership for Children and Young People	020 3045 4320
Birmingham Safeguarding Children Partnership	0121 303 1888
Blackburn with Darwen, Blackpool and Lancashire Children's Safeguarding Assurance Partnership	0300 123 6720 (Lancashire Children's Social Care)
Bolton Safeguarding Children Partnership	01204 337479
Bournemouth and Poole Safeguarding Children Partnership	01202 456744
Bracknell Forest Safeguarding Children Board	01344 352005
Bradford Safeguarding Children Board	01274 437500
Brent Safeguarding Partnership	020 8937 4300
Brighton & Hove Safeguarding Children Partnership	01273 292379
Bristol Safeguarding Children Partnership	0117 903 6444
Bromley Safeguarding Children Partnership	020 8461 7373
Buckinghamshire Safeguarding Children Partnership	01296 382249
Bury Integrated Safeguarding Partnership	0161 253 5678

Cambridgeshire and Peterborough Safeguarding Children Partnership Board	0345 045 5203
Camden Safeguarding Children Partnership	020 7974 3317
Central Bedfordshire Safeguarding Children Board	0300 300 8585
Cheshire East Safeguarding Children's Partnership	0300 123 5012
Cheshire West and Chester Safeguarding Children Partnership	0300 123 7038
City of London and Hackney Safeguarding Children Partnership	020 8356 4183
Cornwall and Isles of Scilly Safeguarding Children Partnership	0300 123 1116
Coventry Safeguarding Children Partnership	024 7683 3443
Croydon Local Safeguarding Children Partnership	020 8726 6400
Cumbria Local Safeguarding Children Partnership	0333 240 1727
Darlington Safeguarding Children Partnership Board (DSCPB)	01325 406222
Derby and Derbyshire Safeguarding Children Partnership	01629 533190
Devon Children and Families Partnership (DCFP)	0345 155 1071
Doncaster Safeguarding Children Partnership	01302 737777
Dorset Safeguarding Children Board	01305 228558
Dudley Safeguarding People Partnership	0300 555 0050
Durham Safeguarding Children Partnership	03000 267 979
Ealing Safeguarding Children Partnership (ESCP)	020 8825 8000
East Riding Safeguarding Children Partnership	01482 395500
East Sussex Safeguarding Children Partnership	01323 463222
Enfield Safeguarding Children's Partnership	020 8379 5555
Essex Safeguarding Children Board	0345 603 7627

Gateshead Local Safeguarding Children Partnership	0191 433 2653
Gloucestershire Safeguarding Children Board	01452 426565
Greenwich Safeguarding Children Partnership	020 8921 4477
Halton Safeguarding Children Partnership	0151 907 8305
H&F, Kensington and Chelsea, Westminster Safeguarding Children Partnership	020 8753 6600
Hampshire Safeguarding Children Partnership	0300 555 1384
Haringey Safeguarding Children Partnership	020 8489 4470
Harrow Strategic Safeguarding Partnership	020 8901 2690
Hartlepool and Stockton-on-Tees SCP (HSSCP)	01429 523825
Havering Safeguarding Children Board	01708 433222
Herefordshire Safeguarding Children Partnership	01432 260800
Hertfordshire Safeguarding Children Partnership (HSCP)	0300 123 4043
Hillingdon Local Safeguarding Children Partnership	01895 556633
Hounslow Safeguarding Children Partnership	020 8583 6600
Hull Safeguarding Children Partnership	01482 448879
Isle of Wight Safeguarding Children Partnership	0300 300 0117
Islington Safeguarding Children Board	020 7527 4209
Kent Safeguarding Children Multi-Agency Partnership	03000 41 91 91
Kingston and Richmond Safeguarding Children Partnership	020 8547 5008
Kirklees Safeguarding Children Partnership	01484 221000
Knowsley Safeguarding Children Partnership	0151 443 2600
Lambeth Safeguarding Children Partnership	020 7926 5555
Leeds Safeguarding Children Partnership	0113 378 6018

Leicester Safeguarding Children Partnership	0116 454 2440
Leicestershire and Rutland Safeguarding Children Partnership	0116 305 7130
Lewisham Safeguarding Children Partnership	020 8314 6660
Lincolnshire Safeguarding Children Partnership	01522 782111
Liverpool Safeguarding Children Partnership	0151 233 3700
Luton Safeguarding Children Board	01582 547653
Manchester Safeguarding Children Partnership	0161 234 5001
Medway Safeguarding Children Partnership	01634 334466
Merton Safeguarding Children Partnership	020 8545 4226
Milton Keynes Safeguarding Children Board	01908 253169
Newcastle Safeguarding Children Partnership	0191 277 2500
Newham Local Safeguarding Children Partnership	020 3373 4600
Norfolk Safeguarding Children Partnership	0344 800 8020
North East Lincolnshire Local Safeguarding Children Partnership	01472 326292
North Lincolnshire Children's MARS Board	01724 296500
North Somerset Safeguarding Children Partnership	01275 888808
North Tyneside Safeguarding Children Partnership	0345 2000 109
North Yorkshire Safeguarding Children Partnership	01609 780780
Northamptonshire Safeguarding Children Partnership	0300 126 7000
Northumberland Safeguarding Children Partnership	01670 536400
Nottingham City Safeguarding Children Partnership	0115 876 4762

Nottinghamshire Safeguarding Children Partnership	0300 500 8080
Oldham Local Safeguarding Children Board	0161 770 7777
Oxfordshire Safeguarding Children Board	0345 050 7666
Plymouth and Torbay Safeguarding Children Partnership	01752 668000 (Plymouth) / 01803 208100 (Torbay)
Redbridge Safeguarding Children Partnership	020 8708 3885
Rochdale Borough Safeguarding Children Partnership	0300 303 0440
Rotherham Safeguarding Children Partnership	01709 336080
Salford Safeguarding Children Partnership	0161 603 4500
Sandwell Safeguarding Children Partnership	0121 569 3100
Sefton Local Safeguarding Children Board	0345 140 0845
Sheffield Safeguarding Children Partnership	0114 273 4855
Shropshire Safeguarding Children Partnership	0345 678 9021
Slough Local Safeguarding Children Partnership	01753 875362
Solihull Local Safeguarding Children Partnership	0121 788 4333
Somerset Local Safeguarding Children Partnership	0300 123 2224
South Gloucestershire Safeguarding Children Partnership	01454 866000
South Tees SCP (Middlesbrough & Redcar & Cleveland)	01642 130700
South Tyneside Safeguarding Children Board	0191 424 5010
Southampton Local Safeguarding Children Partnership	023 8083 3336
Southend-on-Sea Local Safeguarding Children Partnership	01702 215007
Southwark Safeguarding Children Partnership	020 7525 1921
St. Helens Safeguarding Children Partnership	01744 676600

Staffordshire Safeguarding Children Board	0800 1313 126
Stockport Safeguarding Children Partnership	0161 217 6028
Stoke-on-Trent Safeguarding Children Board	01782 235100
Suffolk Safeguarding Children Partnership	0345 606 1499
Sunderland Safeguarding Children Partnership	0191 520 5560
Surrey Safeguarding Children Partnership	0300 470 9100
Sutton Local Safeguarding Children Partnership	020 8770 6001
Swindon Local Safeguarding Children Partnership	01793 466903
Tameside Safeguarding Children Partnership	0161 342 4101
Telford and Wrekin Safeguarding Children Partnership	01952 385385
Thurrock Local Safeguarding Children Partnership	01375 652802
Tower Hamlets Safeguarding Children Partnership	020 7364 3444
Trafford Strategic Safeguarding Partnership	0161 912 5125
Wakefield Safeguarding Children Partnership	0345 850 3503
Walsall Safeguarding Children Partnership	0300 555 2866
Waltham Forest Safeguarding Children Board	020 8496 2310
Wandsworth Safeguarding Children Partnership	020 8871 6622
Warrington Safeguarding Children Partnership	01925 443322
Warwickshire Safeguarding Children	01926 414144
West Sussex Safeguarding Children Partnership	01403 229900
Windsor and Maidenhead LSCB	01628 683234
Wigan Safeguarding Children Partnership	01942 828300
Wiltshire Safeguarding Vulnerable People Partnership	0300 456 0108
Wirral Safeguarding Children Partnership	0151 606 2008

Wolverhampton Safeguarding Together	01902 555392
Worcestershire Safeguarding Children Partnership	01905 822666
York Safeguarding Children Partnership	01904 551900

Scotland

Safeguarding Children Partnership	Phone Number
Aberdeenshire Children and Family Protection Committee	01467 537111
Angus Child Protection Committee	03452 777 778
Argyll and Bute Council Child Protection Committee	01546 605517
Calderdale Safeguarding Children Board	01422 393336
Clackmannanshire & Stirling Child Protection Committee	01786 471177
Dundee Childcare and Protection Committee	01382 307999
East Ayrshire Child Protection Committee	01563 503356
East Dunbartonshire Child Protection Committee	0300 123 4510
East Lothian and Midlothian Public Protection Committee	01620 827999 (East Lothian) / 0131 271 3413 (Midlothian)
East Renfrewshire Child Protection Committee	0141 577 8300

Falkirk Child Protection Committee	01324 506400
Fife Child Protection Committee	03451 551503
Glasgow City Child Protection Committee	0141 287 0555
Highland Child Protection Committee	0800 93 8000
Inverclyde Council Child Protection Committee	01475 714100
Moray Council Child Protection Committee	01343 554370
North Ayrshire Council Child Protection Committee	01294 310300
North Lanarkshire Council Child Protection Committee	01698 403140
Orkney Islands Child Protection Committee	01856 873535
Outer Hebrides (Western Isles) Child Protection Committee	01851 822708
Perth and Kinross Council Child Protection Committee	01738 476811
Renfrewshire Council Child Protection Committee	0300 300 1199
Scottish Borders Child Protection Committee	01835 825000
Shetland Islands Council Child Protection Committee	01595 744420
South Ayrshire Council Child Protection Committee	01292 267675
South Lanarkshire Council Child Protection Committee	0303 123 1008

Stirling Council Child Protection Committee	01786 471177
West Dunbartonshire Child Protection Committee	01389 737373
West Lothian Public Protection Committee	01506 281028

Wales/ N. Ireland/ Jersey

Safeguarding Children Partnership	Phone Number(s)
National Independent Safeguarding Board Wales	Contactable via safeguardingboard.wales/find -your-board/
Cardiff and Vale of Glamorgan Regional Safeguarding Board	As above
Cwm Taf Morgannwg Safeguarding Board	As above
Mid and West Wales Safeguarding Board	As above
South East Wales Safeguarding Board	As above
Western Bay Safeguarding Board	Not publicly listed; contact via sewsc.org.uk
Northern Ireland	Not publicly listed; contact via wbscb.org.uk
Safeguarding Board for Northern Ireland	028 9069 0418
Jersey	
Jersey Safeguarding Partnership Board	01534 442752 (General Enquiries) / 01534 442759 (Training Enquiries)

It may be helpful to find the child safeguarding websites of each local authority listed here:
<https://www.childprotectionuk.co.uk/local-safeguarding-children-boards-for-england-and-wales>

Link to the website: <https://studylinks.co.uk/studylinks-policies>