



INTERNATIONAL
GUARDIANS

SAFEGUARDING POLICY

Crown International Guardians Ltd.

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This Policy was written in June 2021 and updated in August 2021.

It has been reviewed in Jan 2026 and will be reviewed annually thereafter.

Policy statement

Every student should feel safe and protected from any form of abuse which, in this policy, means any kind of neglect, non-accidental physical injury, sexual exploitation or emotional ill-treatment.

The Guardianship Organisation is committed to safeguarding and promoting the welfare of children and young people and expects all staff and host families to share this commitment.

The Guardianship Organisation will take all reasonable measures to:

- Ensure that it practises safer recruitment in checking the suitability of staff and volunteers and host family members (including staff employed by another organisation) to work with children and young people in accordance with the guidance given in *Keeping children safe in education* (Department for Education (DfE), 2025).
- Ensure a safe environment for students, which helps to safeguard their interests.
- Treat all students with care and respect according to their needs and without discrimination of any kind.
- Protect each student from any form of abuse, whether from an adult or another student.
- Be alert to the medical needs of students with medical conditions.
- Strike a proper balance between protecting students and respecting the rights and needs of parents/ guardians/ host family members. However, where there is conflict between these requirements the student's welfare will come first.
- Ensure parents/ guardians/ the College and agents have a right to respect and will be consulted and involved in matters, which concern their family, subject to duties of confidentiality where these apply.
- Provide staff members with child protection training, which will include clarification of responsibilities. All staff will receive basic safeguarding training, in the form of an online training course, and an annual update on safeguarding. Training will be reviewed and renewed every three years.

- Work closely with all agencies and bodies concerned with the protection and welfare of children and any school or college attended by the student to ensure that all allegations of abuse are dealt with justly and promptly.
- Follow the local inter-agency procedures of the North Somerset Community Safety and Safeguarding Partnership (Avon Fire and Rescue, Avon and Somerset Constabulary, North Somerset Clinical Commissioning Group, North Somerset Council and the National Probation Service, Local Safeguarding Children Board, Local Safeguarding Adult Board and the Responsible Authorities Group).
<https://nsscp.co.uk/local-policies-procedures-guidance>
- Be alert to signs of abuse within the Guardianship Organisation, the host family environment or within the school or college attended by the student.
- Deal appropriately with every suspicion or complaint of abuse.
- Ensure that, so far as possible, actions taken to protect a student, do not in themselves cause the student unnecessary distress. Such actions may include consultation with the police, which may result in criminal proceedings.
- Design, and operate procedures, which, so far as possible, ensure that staff/ host family members who are innocent are not prejudiced by false allegations.
- Support students who have been abused in accordance with his/ her agreed child protection plan.
- Design and operate procedures that promote this policy.

Introduction

This document outlines all Crown International Guardians Ltd. (the **Guardianship Organisation**) policy on identifying and responding to concerns regarding the safeguarding and protection of children and young people. This policy, with the associated procedures, provides guidance for all staff who may come across concerns of this nature within the context of their work for the **Guardianship Organisation**. These include:

- All members of the workforce of Crown International Guardians Ltd.
- Host families
- Other individuals, consultants and agencies contracted by Crown International Guardians Ltd.

It also provides information for **students** and their **parents**.

This policy should be read alongside our policies and procedures on:

- Data Protection
- Types of Abuse Policy
- Anti-bullying, E-safety and Cyber-bullying policy
- Anti-Radicalisation Policy
- Online safety policy
- Emergency plan
- Low Level Concerns Policy
- Mental Health Policy
- Missing student Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Whistleblowing Policy

Definition

In relation to children and young people, the Children Act 2004 and the Department for Education (DfE) guidance document: *Working Together to Safeguard Children 2023* (paragraph 2), define safeguarding and promoting children and young people's welfare as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

The above statutory guidance defines child protection as part of safeguarding and promoting welfare. Safeguarding is the activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

A glossary of safeguarding terms can be found at the end of this document for your information. Please do contact one of our Safeguarding Team if you require any additional clarification on anything contained within this policy.

Legal Framework

This policy has been drawn up based on law and guidance that seeks to protect children, namely:

- Children Act 1989
- United Convention on the Rights of the Child 1991
- Data Protection Act 1998
- General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)
- Data Protection Act 2018
- Human Rights Act 1998
- Equality Act 2010
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Keeping Children Safe in Education 2025
- Special educational needs and disability (SEND) code of practice: 0 to 25 years – Statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014 (April 2020 update)
- Information sharing: Advice for practitioners providing safeguarding services to children, young people and carers; HM Government 2015 (updated 2018)
- Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2018 (May 2025 update).

Types of abuse

Further information on types of abuse, and possible indicators of abuse, can be found in the separate document, Types of Abuse Policy.

Abuse can be:

- Bullying:

Bullying is defined as 'behaviour by an individual or group, usually repeated over time, which intentionally hurts another individual or group either physically or emotionally' (DfE definition). Repeated bullying usually has a significant emotional component, where the anticipation and fear of being bullied seriously affects the behaviour of the victim.

Bullying may take the form of any of the following types of abuse:

- Physical abuse:

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

- Emotional abuse

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

- Sexual abuse

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

- Neglect:

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

- Financial and Material:

This could involve theft, fraud, exploitation or the misuse of property, possessions or benefits.

- Discrimination

This may include racist, sexist, ageist, homophobic, religious or disability related and other forms of harassment.

- Radicalisation

Defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups. Further information can be found in our Anti-Radicalisation Policy document. Our Prevent Lead is Mark Stricklin.

- Child Sexual Exploitation

Form of sexual abuse where children are sexually exploited for money, power, sexual gratification 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.

- Domestic Abuse

It is defined as any incident or pattern of incidents of controlling, coercive or 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. This can encompass but is not limited to the following types of abuse: Psychological, physical, sexual, financial and emotional.

Where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships.

This definition, which is not a legal definition, includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

Helplines: <http://www.nationaldomesticviolencehelpline.org.uk>

Advice: <http://www.nhs.uk/Livewell/abuse/Pages/domestic-violence-help.aspx>

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse>

'Honour' based violence encompasses crimes which have been committed to protect or defend the honour of the family and or the community, including Female Genital Mutilation, forced marriage and practices such as breast ironing. Crown International Guardians recognises that all cases of honour-based violence fall under the safeguarding and child protection umbrella and will be treated accordingly.

- Child on child abuse

It can manifest in many different ways, including but not limited to on-line bullying, sexting, banter, initiation rituals and inappropriate or harmful sexualised behaviours. In most instances, the conduct of children and young people towards each other will be covered by the school behaviour policy.

However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Crown International Guardians recognise that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'. The forms of child-on-child abuse are outlined below.

- Domestic abuse – incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- Child Sexual Exploitation– children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- Harmful Sexual Behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.
- Serious Youth Violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19. i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.

The term child-on-child abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

There are also different gender issues that can be prevalent when dealing with child on child abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence).

An individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness

as to the individual's own actions or how they could be perceived. As such, the guardianship organisation sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Signs of abuse

Possible signs of abuse include (but are not limited to):

- Patterns of bruising; inconsistent account of how bruising or injuries occurred
- Finger, hand or nail marks, black eyes
- Bite marks
- Round burn marks, burns and scalds
- Lacerations, wealds
- Fractures
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers
- Over-reaction to mistakes, continual self-deprecation
- Delayed physical, mental, emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Masturbation, Appetite disorders - anorexia nervosa, bulimia
- Soiling, smearing faeces, enuresis
- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate.
- Thrush, Persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusually compliant

- Regressive behaviour, Enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises, scratches in genital area

Designated Safeguarding Lead

We have appointed Mark Stricklin, the Director, to be the Designated Safeguarding Lead (DSL) for child protection for Crown International Guardians Ltd. The DSL is a Guardianship Coordinator of the Guardianship Organisation and can be contacted on 01225 423327 or 07715 123299. In the event that the DSL is not contactable please contact the Operation officer of the Guardianship Organisation. Any concerns or observations regarding the safety or welfare of a student should be reported without delay to the DSL.

In the event that the DSL is unavailable, the Deputy DSL is Leonor Liz-Losada who can be contacted on 01225 423327 or 07551 081009.

The main responsibilities of the DSL are:

- to advise and act upon all suspicion, belief and evidence of abuse reported to him/her.
- to be the first point of contact for host families, parents, guardians, students, the Guardianship Organisation's staff and external agencies in all matters of child protection.
- to co-ordinate child protection procedures within the Guardianship Organisation.
- to maintain an ongoing training programme for all of the Guardianship Organisation's staff and host families.
- to monitor the keeping, confidentiality and storage of records in relation to child protection.
- to liaise as necessary with the DSLs for child protection appointed by the Schools or colleges attended by students and the relevant child protection officers appointed by the Social Services Department (Local Authority Designated Officers (LADOs)).
- to keep parents / guardians informed of action to be taken under these procedures in relation to their child in consultation with the school or college and Designated Officers for Allegations.
- if requested, to monitor records of students who are subject to a child protection plan to

ensure that this is maintained and updated as notification is received and to liaise with other professionals to ensure that these children are monitored.

- where appropriate, to take part in child protection conferences or reviews.

Personnel

All personnel will undergo an enhanced Disclosure and Barring Service (DBS) Check as well as the barred list check. An enhanced DBS check (also called disclosure) has no official expiry date. Any information included is accurate at the time the check was carried out. It is recommended good practice that a new check is carried out every 3 years.

Note: it is illegal to engage someone to work with children or vulnerable adults if they are in the DBS 'barred list'.

Students

UK or Foreign nationals studying in UK who will normally be under the age of 18, or reaching the age of 18 during the school year. Parents of these students will have granted Crown International Guardians certain responsibilities and completed and signed a Guardianship Agreement.

It is the duty of the **student** to assist in their own safeguarding and guidance on how to comply is included in the student handbook.

Parents

Parents or legal guardians of **Students**, who are not normally resident in UK.

We will work closely with the parents and promote open communication except where this may endanger the **student**.

Staff

Staff are employees of the **Guardianship Organisation**, and have unsupervised access to **students**, their information and data as follows:

The Director, Mark Stricklin who is **Guardian** for all students, and is the **Designated Safeguarding Lead**.

Administrative staff, who have no direct contact with **students**, **Parents** or schools but have access to **students**, **parents** and **host families** information and data.

Specialist staff and contractors, who have no direct contact with **students**, but have access to **students** information and data.

In addition, the following people are not **staff**, but are listed here for safeguarding purposes, include:

- **Drivers** and **accompanying adults**, who have direct contact with **students**. **Drivers** may have unsupervised contact while transporting **students** to and from airports, schools and other locations. **Accompanying adults** will normally accompany **students** who are under the age of 14 or have additional needs.

Further, there may be others who come into contact with **students**, for example **students** and **staff** of **other Guardianship Services**, who may share transport arrangements.

Contact with students

Staff and **drivers** will endeavour to keep physical contact with the **student** to a minimum and should conform with the following guidelines:

- The physical integrity of the students will be respected at all times. Staff may not engage in inappropriate physical contact of any kind.
- Under no circumstances may a **staff** member give alcohol, tobacco or drugs to students.
- **Staff** members will prudently avoid situations in which they are alone with **students** in rooms or areas which are locked or made inaccessible to others.
- **Student's** bedroom must always be regarded as private space and staff members may never visit a student in his or her bedroom or dormitory except when exercising specific responsibilities or duty of care. In this case, doors should be left ajar or another **staff** member made aware of the course of action being followed.
- **Staff** involved in transporting students will exercise prudence if transporting **students** individually and will inform the office in cases where such transport is unavoidable.

Procedures

Procedures specific to certain roles are covered in the appropriate handbook, but there are a number of procedures which are common to all, or should be understood by all parties.

- Immigration
- The Guardianship Organisation

Complaints and Allegations

Students, parents, host families and members of staff should feel comfortable reporting any concerns, Crown International Guardians will treat any concerns seriously.

Who to share a concern with:

Any concern should be shared with the DSL (Mark Stricklin) on 07715 123299 or by email at mail@crowninguardians.co.uk

The DDSL Leonor Liz-Losada can be contacted on 07551 081009 or by email at leoliz@crowninguardians.co.uk.

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.

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 Crown International Guardians will aim to do this as far as reasonably possible. Records are kept securely and comply with 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, Crown International Guardians 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 then be referred to the LADO.

1. Initial Procedure when abuse is suspected or a complaint is made

A staff or host family member suspecting or hearing a complaint of abuse should report all allegations or complaints of abuse to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead (if DSL not available) or, if the complaint involves the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead, please report the complaint to the North Somerset Safeguarding Children Partnership LADO's (Local Authority Designated Officer) – Allyson Donovan (lado@n-somerset.gov.uk) or the duty LADO on 07386 963 406.

Details of procedures for reporting allegations against staff, host family members or other students are given on pages 17 and 18.

Staff or host family members should:

- listen carefully to the student and keep an open mind. Staff or host family members should not take a decision as to whether or not the abuse has taken place;
- not ask leading questions, (a question which suggests its own answer).
- reassure the student but not give a guarantee of absolute confidentiality. The staff or host family member should explain that they need to pass the information to the Designated Safeguarding Lead who will ensure that the correct action is taken (please note that the giving of information to others, who have an obligation to receive the information for the purpose of protecting a child, is not a breach of confidentiality).
- keep a sufficient written record of any conversation regarding the suspected abuse. There is a disclosure form available in this document for this purpose. It is also available as a standalone document which can be provide to you on request. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Safeguarding Lead as soon as possible.
- attempt to safeguard and preserve all available evidence, (for example, notes, mobile phones containing text messages, clothing, computers).

- as soon as reasonably practicable after making a verbal report to the Designated Safeguarding Lead, ensure the written disclosure form is passed to the DSL or DDSL (in his absence);
- if deemed necessary and with full support from the DSL or DDSL immediately provide a safe environment for the student.

Once the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead has been informed of the allegations or complaints of abuse, the staff or host family member suspecting or hearing of the abuse should continue to pass on any further information that comes to light but should not carry out any further investigations into the incident as this may prejudice the investigations of external agencies.

Parents and others who suspect abuse by or hear a complaint of abuse involving a Crown International Guardian student should also inform the Designated Safeguarding Lead straightaway.

2. Action taken by the Designated Safeguarding Lead when abuse is suspected or a complaint is made

The action to be taken will take into account:

- All staff members and homestays have a duty to identify and respond to suspected / actual abuse or disclosures of abuse. Any member of staff, volunteer or homestays who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the DSL (or, in their absence, the DDSL).
- Where there is risk of immediate harm, concerns will be referred immediately by telephone to the LSP [CareConnect on [01275 888 808](tel:01275888808)] or the Police.
- Less urgent concerns or requests for support, including for Early Help, will be sent by the DSL to the LSP via [CareConnect on [01275 888 808](tel:01275888808)].
- The DSL may also seek advice from Social Care or another appropriate agency about a concern, if we are unsure how to respond to it.
- The DSL will refer any safeguarding concerns that relate to an incident in school to the school. Concerns will be referred to the school DSL. If an allegation is made against a member of school staff, the guardianship organisation will check the school policy to see who to refer such matters to. This is usually the Head of the School. If the allegation involves the Head, then usually the chair of governors should be informed.

- Where a concern is not seen to reach the threshold for a referral, the DSL will keep the concern on file and will monitor the situation. Should the concern escalate, a referral will be made to the LSP.
- Wherever possible, we will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to consult with the LSP and/or Police for advice on when to share information with parents / carers.
- If a member of staff or homestay continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, the staff member or homestay concerned should press for reconsideration of the case with the designated safeguarding lead.
- If, for any reason, the DSL (or DDSL) is not available, or you do not feel that your concern is being taken seriously, this should not delay appropriate action being taken. Any individual may refer to the LSP or Police where there is suspected or actual risk of harm to a child. The contact details are included at the beginning of this policy.
- Full records of reports and action taken will be maintained by the DSL and securely stored in a specific safeguarding file.

If the DSL considers that it is likely that a student has suffered significant harm, or that a child may be at risk of significant harm, a referral to social services will be made without delay (and in any event within 24 hours). If the initial referral is made by telephone; the DSL will confirm the referral in writing to social services within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact social services again.

If there is room for doubt as to whether a referral to an external body should be made, the DSL will consult with the Child Protection Advisers on a no names basis without identifying the family.

Where the DSL decides not to refer the concerns to the relevant authorities, the person who raised the concern will be given a clear written statement of the reasons why the Guardianship Organisation is not taking action. The person will be advised that, if they remain concerned, they are free to consult with, or to report to, the relevant authorities. There will be no retribution or disciplinary action taken against a member of staff for making such a report, provided it is done in good faith.

We encourage whistleblowing in the following instances:

- someone's health or safety is in danger
- actions that negatively affect the welfare of children (not only Crown International Guardians students)
- a criminal offence
- not obeying the law
- covering up wrongdoing
- damage to the environment

Further information on this can be found in our Whistleblowing Policy.

3. Allegations against Guardianship Organisation staff, host families or any other adult

Our procedures for dealing with allegations against Crown International Guardians staff and host families aim to balance the need to protect students from abuse and the need to protect staff and host families from false and unfounded allegations. Where appropriate, these procedures follow the guidance in the current edition of the Department of Education guidance Keeping Children Safe in Education September 2025.

This guidance should be followed where it is alleged that anyone working, volunteering or hosting students for Crown International Guardians has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (known as transferable risk)

In the event that there is an allegation against a member of staff, volunteer or homestay, Crown International Guardians will follow the guidance in the most recent version of Keeping Children Safe in Education Part 4.

Allegations against a member of guardianship organisation staff, volunteers or homestays should be directed to the DSL of Crown International Guardians (Mr Mark Stricklin 07715 123299) who will act as “case manager”. The DSL must contact the LADO immediately and follow their advice. They must not investigate themselves before contacting the LADO. If the allegation is about the DSL, please contact the LADO directly.

Crown International Guardians will report promptly to the DBS any person whose services are no longer used for regulated activity because they have caused harm or posed a risk of harm to a child.

Any historical allegations should be referred to the police if they are made by an adult. If they are made by a child, they should be reported to the LADO.

Suspension of staff will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure the safety and welfare of the student or students concerned, and the need for a full and fair investigation.

If an allegation is made against a member of the student's host family, Crown International Guardians will provide the student with alternative accommodation while a full investigation takes place.

Detailed guidance is given to staff and host families to ensure that their behaviour and actions do not place students or themselves at risk of harm or allegations of harm to a student. This guidance is contained in Crown International Guardians Host Family Handbook.

There is also clear guidance given in the staff Code of Conduct which is handed out to staff at their induction.

All staff are required to report to the Designated Safeguarding Lead any concern or allegations about Crown International Guardians’ practices or the behaviour of colleagues or host family members which they feel are likely to put students at risk of abuse or other serious harm. There will be no retribution or disciplinary action taken against a member of staff for making such a report, provided that it is done in good faith.

If Crown International Guardians ceases to use the services of a member of staff because they are unsuitable to work with children, a compromise agreement will not be used and there will be a prompt and detailed report to the Disclosure and Barring Service (DBS) or other relevant body as determined by future legislation. This report will be made by the appropriate DSL.

Any such incidents will be followed by a review of the safeguarding procedures within Crown International Guardians and will be carried out by the DSL Team.

If a member of staff tenders his or her resignation, or ceases to provide his or her services, any safeguarding allegations will still be followed up by the Guardianship Organisation. Resignation will not prevent a prompt and detailed report being made to the DBS or other relevant body as determined by future legislation, in appropriate circumstances. This report will be made by the appropriate DSL.

4. Allegations against students

If a student for whom we have responsibility is accused of abuse against another student for whom we have responsibility, we will take all appropriate action to ensure the safety and welfare of both students, including the student accused of abuse. These procedures will also apply as appropriate if a student for whom we have responsibility is accused of abuse against any other student for whom we do not have responsibility.

If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, we will ensure that, in consultation with the student's school or college, parents or guardians are informed as soon as possible by the school and that the student is supported during the interview by an appropriate adult.

If the school or college decide that it is necessary to suspend the student during the investigation, we will provide appropriate support, assistance and accommodation wherever safe and possible.

Any concerns, disclosures or allegations of child on child abuse in any form should be referred to the Designated Safeguarding Lead. Where a concern regarding child on child abuse has been disclosed to the DSL, advice and guidance will be sought Children's Services and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

5. Allegations that do not meet the threshold

Low level concerns:

Crown International Guardians has a Low Level Concerns policy that outlines the processes we will follow to deal with concerns (including allegations) which do not meet the harm threshold set out above. We also have a staff code of conduct that explains professional boundaries. Staff, homestays and volunteers are expected to act within these boundaries, and in accordance with the ethos and values of Crown International Guardians. It is imperative that staff understand the

importance of reporting any concerns that they may have.

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

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

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

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

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

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

The safety and wellbeing of students in our care is dependent on the vigilance of all our staff, volunteers and homestays and their prompt communication to the DSL or the Company Director of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. Crown International Guardians is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside our care. The notification and prompt handling of all concerns about adults is fundamental to safeguarding students. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours.

Our separate Low Level Concern Policy outlines how we will manage and record any low level concerns and take appropriate action to safeguard children.

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

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

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

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

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

Self-Reporting

Crown International Guardians recognises that staff and host families may find themselves in a situation which could be misinterpreted, or might appear compromising to others, or, on reflection feel they behaved in a manner which they consider falls below the standard set out in the code of conduct. Crown International Guardians encourages self-reporting in these circumstances, and it is seen as a positive action.

Self-reporting promotes safeguarding and safer practice by:

- enabling staff and volunteers to get support with a potentially difficult issue and/or addressing it at the earliest opportunity;
- demonstrating awareness of the expected behavioural standards and self-awareness as to the person's own actions or how they could be perceived; and,

- contributing to maintaining a culture where everyone aspires to the highest standards of conduct and behaviour

We encourage staff and homestays to self-report any situation which could appear compromising or be misconstrued, or where their behaviour has fallen below the standards required in the Staff or Host Family Code of Conduct. We will then follow our procedure above and will interview the person who is self-reporting first to get a full report.

Data Protection, Confidentiality and Information Sharing

The Guardianship Organisation will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of the students. We will cooperate with police and social services to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of *Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children* (HM Government, May 2025).

Except in exceptional circumstances we will always notify the school attended by the student of any concerns relating to a student's safety or welfare.

Any personnel who have access to any information relating to students and parents are subject to regulations protecting that data. Information must not be divulged to any person unless a student is at risk if the information is not shared. If in any doubt the advice of the DSL should be sought. Further information can be found in our Data Protection Policy.

Monitoring

Following any child protection incidents involving students for whom the Guardianship Organisation has responsibility, the DSL will review this policy and the procedures and will make a prompt report to the Project Manager.

In addition, the DSL will monitor the operation of this policy and its procedures and will make an annual report to the Project Manager.

Crown International Guardians Ltd

Rickford Mill, Leg Lane, Rickford, BS40 7AH, England Tel +44 (0)1225 425125 mail@crowninguardians.co.uk



The Project Manager will ensure that any deficiencies or weaknesses in regard to child protection arrangements at any time are remedied without delay.

Contact numbers

If you have any concerns regarding a child, please contact the Designated Safeguarding Lead in the first instance however, you can also make a referral directly to the Community Safety and Safeguarding Partnership in your area. All contact details for your area are included in the staff/student handbook.

If you have any concerns or would like to make a referral relating to an allegation of a staff member please contact the Designated Safeguarding Lead in the first instance however, you can also make a referral directly to the North Somerset Council LADO.

The telephone numbers of the key personnel to contact in Bath and North East Somerset Community Safety and Safeguarding Partnership and Crown International Guardians are as follows:

Designated Safeguarding Lead - Mark Stricklin	01225 423 327 or 07715 123299 (24 Hours)
Deputy Designated Safeguarding Lead – Leonor Liz-Losada	01225 423 327 or 07551 081009 (24 Hours)
Deputy Designated Safeguarding Lead – Daisy Qi	01225 423 327 or 07788 973860 (24 Hours)
Project Manager - Alan MacRae	01249 712014 or 07854 469981
LADO: (North Somerset) – Allyson Donovan	07386 963 406 or LADO@n-somerset.gov.uk
MASH (North Somerset)	0300 123 2224 or childrens@somerset.gov.uk
Child Protection Advisers (North Somerset)	01275 888 808
Children and Families Assessment and Intervention Team: care.connect@n-somerset.gov.uk	01275 888 808
Emergency Duty Team Out of Hours Contact:	01454 615 165
NSPCC Helpline:	0808 800 5000

In the first instance please contact the Designated Safeguarding Lead. For advice regarding a child please contact the Child Protection Advisers. For a direct referral regarding a child please contact Children and Families Assessment and Intervention Team. For a direct referral regarding a person who



works with children (i.e. behaved in a way that has harmed, or may have harmed, a child. possibly committed a criminal offence against children, or related to a child) please contact the LADO.

If a child is in immediate danger or is at risk of serious significant harm, the practitioner should contact the Police (999) and refer to MASH (The Multi-Agency Safeguarding Hub enables the sharing of information between services so risks to children can be identified at an early stage) as soon as possible.

Child protection incident reporting form

1. Introduction

- 1.1 This form comprises part of the Organisation's Child Protection suite of documents and should be read in conjunction with the Child Protection Policy.
- 1.2 This form is designed to be completed by any member of staff who receives information raising child protection concerns either through observation or direct disclosure, from a student or from another source. The purpose of this form is to ensure that an adequate amount of information is recorded at the outset. This form must be completed as soon as possible after the information is received even where this happens away from the Guardianship.

Do not allow the completion of the form to delay notification of the concerns to the Guardianship Organisation's **Designated Safeguarding Lead (DSL)** but pass the completed form to the DSL or the Operations Officer of the Guardianship Organisation if the DSL is unavailable, as a matter of urgency.
- 1.3 The Guardianship Organisation's DSL for child protection is Mark Stricklin.
- 1.4 The LADO for Crown Guardians Limited is North Somerset Council LADO

2. Data protection information notes

- 1.1 The Guardianship Organisation holds personal information about students in order to safeguard and promote their welfare, promote the objects and interests of the Guardianship Organisation.
- 1.2 The content of this form, when completed, will contain personal information which is subject to the provisions of the Data Protection Act 1998. Students, and in certain circumstances their parents or guardians, have the right to request access to personal information about them held by the Guardianship Organisation, including the content of this form, although exemptions may apply depending on the circumstances. Legal advice should be sought before any information of this nature is disclosed to students, parents or guardians.
- 1.3 The Guardianship Organisation will keep this record confidential, password protected and stored in the organisation's cloud, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. For example, where, in the professional opinion of the DSL, it is deemed necessary we may share this information with the social services or the police for the purpose of child protection investigations.

To be completed by a member of staff

Remember:

- ask "open" questions and not leading questions, that is, a question which suggests its own answer.
- listen carefully and keep an open mind.
- do **NOT** take any decision as to whether the alleged abuse or neglect has taken place.

Reporting form

Please complete in black pen	
Date	
Time	
Place	
Member of staff present and position	
Full name of student(s)	
Before proceeding have you reassured the student that you are there to help them but you cannot guarantee absolute confidentiality? Have you explained that you may need to pass the information on to the Designated Safeguarding Lead Mark Stricklin who will ensure the correct action is taken?	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
Ask the student to explain their concern or allegation and record details of the matter in the space below. Use a separate sheet if necessary and then attach to the form.	

A non-exhaustive list of the details to be included:

- what was said or done, by whom, to whom and in whose presence.
- when the incident took place and where.
- whether the student wishes their parents [or legal guardian] to be informed.

Any additional comments or evidence



Details may include, for example, any concerns you may have about signs of abuse, emotional ill-treatment or neglect.

Please also include a note of any other evidence, for example, written notes, items of clothing or mobile phone messages relating to the matter.

Any suspicion or complaint of abuse must be reported to the Designated Safeguarding Lead, Mark Stricklin, or if the complaint involves a member of staff or host family, to the Designated Safeguarding Lead or the Operations officer of the Guardianship Organisation.

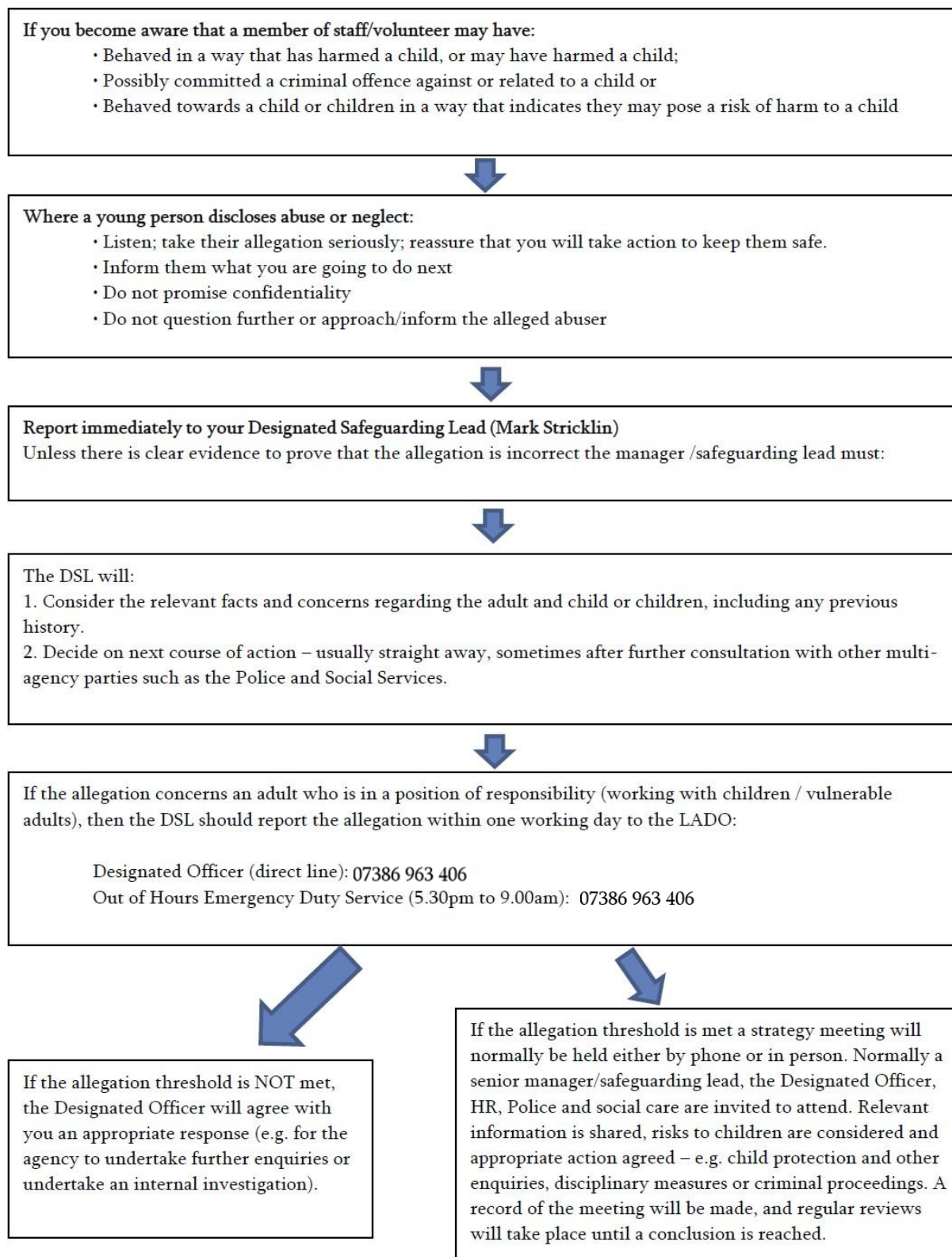
DO NOT investigate the matter, as this could prejudice the investigations of outside agencies.

Where the concern or allegation is made against the DSL, you must immediately inform the Project Manager of the Guardianship Organisation, without first notifying them.

Please record what action you have taken and when

Full name of member of staff

Signature



Glossary of commonly used Safeguarding terms

Abuse - Abuse is any form of maltreatment of a child and covers every form of 'abuse', including sexual, emotional, psychological, material, financial, physical, discriminatory or organisational abuse.

Alert - An alert is a concern that an individual is or may be a victim of exploitation, neglect or abuse.

Assessment - An assessment is a process put in place that identifies the needs of an individual, whether these needs are being met and how their wellbeing and day to day life are being impacted.

Child Protection - Child Protection is a term used to describe the activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm.

Consent - Consent refers to the individual's voluntary and continuing permission for an intervention. The individual must have adequate knowledge of the reason nature, likely consequences and risks of that intervention.

CPS - CPS is short for Crown Prosecution Service. This is a government department that's responsible for prosecuting criminal cases that are investigated by the police in England and Wales.

DBS - DBS is the acronym used for the Disclosure and Barring Service. The DBS is a governmental body.

Designated Safeguarding Lead - The Designated Safeguarding Lead refers to the individual within an organisation who's responsible with management, oversight and coordination where allegations are made or concerns raised about a person.

Domestic abuse - Domestic abuse refers to any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over. This also includes those who are or have been intimate partners or family members.

Enhanced DBS Check - An enhanced DBS check is a form of Disclosure and Barring Service check.

GDPR - GDPR stands for the General Data Protection Regulation. This is an EU regulation and law on data protection and privacy for all individuals within the EU and EEA.

Harm - Harm refers to any ill-treatment including sexual abuse and ill-treatment that isn't physical, the avoidable deterioration and or impairment in physical or mental health. of physical, intellectual, emotional, social or behavioural development.

Hate crime - A hate crime is any crime that is thought to be a crime that's been committed against someone for racist, homophobic, transphobic reasons. This may also be due to a person's religion, belief, gender identity or disability.

Human trafficking - Human trafficking refers to the recruitment, transportation, transfer, and harbouring of someone with the intention of threatening them or using force and or other forms of coercion, and abusing the power or of a position of vulnerability, and achieving coerced consent of a person having control over someone else by giving and receiving of payments or benefits, for the purpose of exploitation.

LSP -LSP stands for the Local Safeguarding Partnerships, which is compiled of a team of key professionals from three sectors: the local authority; the clinical commissioning group for any area that falls under the local authority and the chief officer of police for any area that falls under the local authority.

MASH - MASH stands for Multi-Agency Safeguarding Hub. This service is made up of Police, Adult Services, NHS and other organisations. MASH helps agencies to act quickly in a coordinated and consistent way. This means that the person at risk is kept safe.

PREVENT -PREVENT is a Government strategy that was launched in 2007. This strategy aims to stop people from becoming terrorists or supporting terrorism and is part of the government's counter-terrorism strategy
Safeguarding -Safeguarding is the term used to describe any activity that protects a person's right to live in safety, free from abuse and neglect.

SELF-NEGLECT -Self-neglect is the intentional or unintentional the inability to maintain a socially and culturally accepted standard of self-care, that results in serious consequences to the health and well-being of the individual.

SIGNIFICANT HARM - Significant harm refers to any ill-treatment (including sexual abuse and forms of ill-treatment which are not physical), that has resulted in the impairment of physical, intellectual, emotional, social or behavioural development