



UK SPEEDER CONSULTING LTD

[Safeguarding and Child Protection Policy]

This document consolidates all key safeguarding-related policies for UK Speeder Consulting Ltd, in alignment with AEGIS accreditation requirements.



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1. Introduction & Statement of Commitment

1.1 Legal and Regulatory Framework

This policy is governed by, and complies with, the following legislation, statutory guidance, and standards:

- Children Act 1989 and 2004
- *Keeping Children Safe in Education (KCSIE) 2025*
- *Working Together to Safeguard Children 2023*
- *Prevent Duty Guidance for England and Wales*
- Data Protection Act 2018 and UK GDPR
- Public Interest Disclosure Act 1998
- AEGIS Guardianship Organisation Quality Standards and Accreditation Handbook

UK Speeder Consulting Ltd ensures that all safeguarding procedures and practices are aligned with these requirements.

1.2 Our Commitment to Safeguarding

UK Speeder Consulting Ltd is fully committed to safeguarding and promoting the welfare of all children and young people in our care, regardless of age, ability, culture, race, language, religion, gender, or sexual identity.

We recognise the additional vulnerabilities of international students, who may face language barriers, cultural differences, or unfamiliarity with UK safeguarding systems, and we take proactive steps to ensure their safety.

This policy applies equally to students in full boarding schools as well as those in homestays.

1.3 Listening to Children

We will always take into account the wishes and feelings of a child when determining what action to take and what services to provide.

- The child's views will be considered seriously, even if they do not align with the adult's perspective.
 - We understand that children may not always disclose concerns or may be unaware that their experiences are harmful.
 - All staff, volunteers, and homestays are expected to exercise professional curiosity and report concerns to the DSL without delay, even in the absence of a direct disclosure.
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1.4 How We Keep Children Safe

We will safeguard children by:



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- Creating a culture of openness, accountability, and vigilance
 - Offering regular safeguarding training to all staff, volunteers, and homestays
 - Maintaining clear reporting channels and a 24-hour emergency contact number
 - Ensuring each child knows how to raise concerns
 - Acting promptly and appropriately on all safeguarding concerns
 - Working in partnership with schools, Local Safeguarding Partners (LSPs), social care, and other relevant agencies
-

1.5 Related Policies and Procedures

This policy should be read in conjunction with:

- Safer Recruitment Policy
 - Staff Code of Conduct
 - Student Behaviour Code of Conduct and Student Handbook
 - Complaints Policy
 - Welfare, Health and Safety Policy
 - Emergency Procedure
-

1.6 Key Definitions

Safeguarding – Protecting the health, wellbeing, and rights of children; ensuring they grow up in a safe environment.

Child Protection – Specific actions taken to protect children who are at risk of significant harm.

DSL – Designated Safeguarding Lead.

LADO – Local Authority Designated Officer.

LSP – Local Safeguarding Partners.

This policy applies to all staff, homestay providers, contractors, and volunteers engaged by UK Speeder Consulting Ltd, in all settings where students are present, including homestays, schools, travel, and activities. We will provide ongoing training, guidance, and supervision to ensure all adults understand and can fulfil their safeguarding responsibilities in practice.



2. Roles & Responsibilities

2.1 Designated Safeguarding Lead (DSL)

Name: Ms Xue Yan

Email: alexi.y@ukspeeder.com

Mobile (24/7): +44 7385335872

Training: Level 3 safeguarding certified; refreshed at least every two years.

Key Responsibilities:

- Take lead responsibility for safeguarding and child protection within the organisation.
 - Ensure all concerns are acted upon promptly and appropriately.
 - Make referrals to Children's Social Care, the Police, the Local Authority Designated Officer (LADO), or other agencies where a child is at risk of harm.
 - Liaise with schools, Local Safeguarding Partners (LSPs), Local Authority Designated Officers (LADOs), and other relevant agencies.
 - Keep accurate, secure safeguarding records.
 - Provide safeguarding induction and ongoing training for all staff, volunteers, and homestays.
 - Ensure all staff receive regular safeguarding training and provide at least annual safeguarding updates.
 - Provide advice and support to staff on safeguarding concerns, and ensure that students are supported and listened to in safeguarding matters.
 - Be available during working hours (in person, by phone, or virtually) to discuss safeguarding concerns.
 - Ensure safeguarding policy and procedures are implemented consistently and reviewed regularly.
-

2.2 Deputy Designated Safeguarding Lead (Deputy DSL)

Name: Junqi Yang— Educational Guardian

Email: jas.yang@ukspeeder.com

Mobile (24/7): +44 7598854558

Training: Currently Level 2 safeguarding certified; will complete Level 3 training within the next three months and thereafter refresh every two years.

Key Responsibilities:

- Support the DSL in all safeguarding duties.
 - Act as safeguarding lead in the DSL's absence.
 - Assist with safeguarding record-keeping and follow-up actions.
 - Liaise with parents, schools, and homestays as needed.
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2.3 Availability & Cover Protocol

Our organisation ensures that emergency safeguarding cover is available at all times, including during office closures and holiday periods. A DSL or Deputy DSL will always be contactable (by phone or virtually) to provide



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immediate safeguarding advice and to take action where required. The organisation operates a single main 24/7 safeguarding contact number:

24/7 Safeguarding Contact: +44 7385335872

This number is monitored by DSL, ensuring that students, parents and schools always have immediate access for safeguarding concerns.

This structure ensures that:

All safeguarding concerns are received and acted upon without delay.

A clear single point of contact is available for students, parents and schools.

Both the DSL and Deputy DSL remain available and accountable for safeguarding responsibilities in line with AEGIS and KCSIE requirements.

2.4 Boarding School Students

During term time, the primary responsibility for day-to-day safeguarding lies with the boarding school and its Designated Safeguarding Lead (DSL).

UK Speeder Consulting Ltd maintains close communication with the school to ensure student welfare and to act as the parents' representative in the UK.

UK Speeder provides a 24/7 emergency safeguarding contact for all students, including those at full boarding schools.

For exeat weekends, half-term breaks, and holiday periods, UK Speeder arranges safe, risk-assessed homestay accommodation or alternative placements, ensuring safeguarding standards are upheld outside of school.

2.5 Under-18 Students in Student Accommodation (University or Foundation Year)

Some students under the age of 18 may be enrolled in a university foundation programme or the first year of undergraduate study and may live in university-managed or private student accommodation. In such cases, UK Speeder Consulting Ltd continues to hold safeguarding responsibility as the appointed guardian.

Our safeguarding measures for under-18 students in student accommodation include:

- Ensuring that the accommodation provider or university is aware that the student is under 18 and that appropriate welfare supervision is in place.
- Maintaining up-to-date parental consent and contact information.
- Conducting a welfare visit or virtual welfare check at the start of the accommodation period and at regular intervals.



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- Keeping regular communication with the student and their parents to monitor wellbeing, academic engagement, and general safety.
- Liaising with the university's welfare, accommodation, or safeguarding team in case of any concern.
- Providing 24/7 emergency contact and safeguarding support, as with all students under our guardianship.
- Escalating any safeguarding concern immediately to the DSL or relevant authorities in accordance with statutory guidance.

Private rental accommodation (independent tenancy agreements) is not permitted for students under the age of 18, as minors cannot hold legal tenancy and such arrangements do not meet safeguarding requirements.

2.6 Staff, volunteer and homestays Responsibilities

Full safeguarding responsibilities for all organisational roles — including the DSL, Deputy DSL, staff, volunteers, homestays, and directors — are set out in our Safeguarding Roles and Responsibilities Framework (available upon request).

This includes awareness of cultural, dietary, religious, and age-appropriate supervision needs (see Welfare, Health & Safety Policy).

This policy summarises key DSL responsibilities in line with Keeping Children Safe in Education (KCSIE 2025) and AEGIS Guardianship Organisation Quality Standards.

3. Local Safeguarding Partners (LSP) and LADO Contacts

UK Speeder Consulting Ltd is headquartered in Manchester and operates a regional branch in Newcastle upon Tyne.

Our safeguarding responsibilities extend across both regions, and we maintain direct contact with **Local Safeguarding Partnership (LSP) and Local Authority Designated Officer (LADO):**

Primary Office – Manchester

Local Safeguarding Partnership (LSP):

Manchester Safeguarding Children Partnership (MSCP)

Website: www.manchestersafeguardingpartnership.co.uk

Report a concern (24/7): 0161 234 5001

Email (Contact Centre): mcsreply@manchester.gov.uk



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Local Authority Designated Officer (LADO):

Manchester City Council – Designated Officer for Allegations

Tel: 0161 234 1214

Email: lado@manchester.gov.uk

Regional Branch – Newcastle upon Tyne

Local Safeguarding Partnership (LSP):

Newcastle Safeguarding Children Partnership (NSCP)

Website: www.newcastlescp.org.uk

Online referral form: Report a Concern [newcastle-central.oncreate.app/w/webpage/request?service=irs_public_referral](https://central.oncreate.app/w/webpage/request?service=irs_public_referral)

Tel (Children's Social Care): 0191 277 2500

Local Authority Designated Officer (LADO):

Newcastle City Council – Designated Officer for Allegations

Tel: 0191 277 4636

Email: lado@newcastle.gov.uk

For students hosted in other areas, contact with the relevant local LSP or LADO may also be made as appropriate; however, the Manchester Safeguarding Children Partnership remains the primary point of reference for UK Speeder Consulting Ltd.

The following list contains the primary LSP/LADO contacts for multiple regions in the UK. This list is reviewed annually and immediately updated if any details change.

Region / Local Authority	Phone	Email	Website/Notes
Newcastle (Tyne & Wear)	0191 277 4636	lado@newcastle.gov.uk	https://nesubregion.trixonline.co.uk/chapter/newcastle-local-contacts
County Durham	03000 268835	cypsladosecure@durham.gov.uk	https://durhamcs.trixonline.co.uk/chapter/local-contacts



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Region / Local Authority	Phone	Email	Website/Notes
Greater Manchester – Wigan	01942 486 034	lado@wigan.gov.uk	https://greatermanchesterscp.trixonline.co.uk
Greater Manchester – Oldham	0161 770 8870	colette.morris@oldham.gov.uk	https://greatermanchesterscp.trixonline.co.uk
Greater Manchester – Rochdale	0300 303 350	lado@rochdale.gov.uk / ehash@rochdale.gov.uk	https://greatermanchesterscp.trixonline.co.uk
Greater Manchester – Salford	0161 603 4350	stephen.westhead@salford.gov.uk / elizabeth.peppiatt@salford.gov.uk	https://greatermanchesterscp.trixonline.co.uk
Greater Manchester – Stockport	0161 474 5657	gill.moore@stockport.gov.uk	https://www.stockport.gov.uk/start/contact-the-lado
West Midlands (Solihull)	07795 128638	lado@solihull.gov.uk	https://www.solihull.gov.uk
Warwickshire	01926 414144 / 01926 886922	lado@warwickshire.gov.uk	https://www.safeguardingwarwickshire.co.uk
London – Kensington & Chelsea	020 7361 2120	kclado.enquiries@rbkc.gov.uk	https://www.rbkc.gov.uk
London – Lewisham	020 8314 7280 / 020 8314 6660	LewishamLADO@Lewisham.gov.uk / MashAgency@Lewisham.gov.uk	https://lewisham.gov.uk
London – Westminster	020 7641 7668	lado@westminster.gov.uk	https://fisd.westminster.gov.uk
London – Tower Hamlets	020 7364 0677	via online form	https://www.towerhamlets.gov.uk
Oxford (Oxfordshire)	0345 050 7666 / 0800 833 408	lado.safeguardingchild@oxfordshire.gov.uk	https://www.oxfordshire.gov.uk
Cambridge (Cambridgeshire)	01223 727 967 / 01733 234 724	LADO@cambridgeshire.gov.uk	https://www.cambridgeshire.gov.uk

In accordance with KCSIE 2025 (para 123) and AEGIS Quality Standard 2.1:

This list is available to **all staff, homestays, and volunteers**. It is included in our **safeguarding induction pack**.

All staff are trained on **when and how** to contact the LADO or LSP directly if necessary.



4. Recognising Signs of Abuse and Neglect

All staff, volunteers, and homestays at UK Speeder Consulting Ltd share a responsibility to protect children from harm by being alert to possible indicators of abuse or neglect. **Early recognition and reporting are essential for effective safeguarding.**

In line with Keeping Children Safe in Education (KCSIE) 2025 – Part 1 (paras 19–32) and Working Together to Safeguard Children 2023, abuse is categorised into four main types:

4.1 Categories of Abuse

In line with *Keeping Children Safe in Education (KCSIE) 2025* and *Working Together to Safeguard Children*, abuse is categorised into four main types: (For detailed definitions and further guidance, please refer to *Keeping Children Safe in Education (KCSIE 2025)* available at: [Keeping children safe in education 2025](#))

Physical Abuse: Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. It also includes situations where a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional Abuse: Emotional abuse is the persistent emotional maltreatment of a child such that it causes severe and long-lasting adverse effects on their emotional development. It may involve conveying to children that they are worthless, unloved or inadequate, deliberately silencing them, placing inappropriate expectations on them, or exposing them to the ill-treatment of others.

Sexual Abuse: Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration, or non-contact activities such as involving children in viewing sexual images, encouraging them to behave in sexually inappropriate ways, or grooming a child online. Sexual abuse can occur both online and offline.

Neglect: Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, which is likely to result in the serious impairment of their health or development. Neglect may involve failing to provide adequate food, clothing, shelter, supervision, medical treatment, or emotional care, as well as failing to protect a child from harm.

In addition to the four main categories of abuse outlined above, it is important to recognise that abuse can also occur between children. This is referred to as Child-on-Child Abuse. It is not a separate category in itself but may involve one or more of the types of abuse already described (e.g. physical, emotional, sexual abuse, or neglect). Given its prevalence in school and homestay settings, Child-on-Child Abuse is addressed separately in this policy, with further detail provided regarding sexual violence and sexual harassment.

Child-on-child Abuse

Children may be harmed by other children. Child-on-child abuse can manifest itself in many ways, including (but not limited to) bullying, physical abuse, sexual violence, sexual harassment, online abuse, upskirting, and initiation/hazing-type violence. Such abuse will never be dismissed as “banter” or “part of growing up.”

Child-on-child Sexual Violence and Sexual Harassment



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Sexual violence refers to offences under the Sexual Offences Act 2003, including rape, assault by penetration, and sexual assault.

Sexual harassment refers to unwanted conduct of a sexual nature, which can occur online or offline, inside and outside of school or homestay settings. This includes sexual comments, jokes or taunting; physical behaviour such as unwanted touching; displaying or sharing sexual images (including nude or semi-nude images); and online sexual harassment.

Such behaviour may occur between peers or within intimate partner relationships. All reports will be taken seriously, recorded, and responded to promptly, following the guidance in Part 5 of KCSIE. Victims will be offered ongoing protection and support, while alleged perpetrators will also be assessed for risk and support needs.

4.2 Additional Safeguarding Concerns

Staff should also be alert to other safeguarding risks identified in KCSIE 2025 Annex B and AEGIS guidance, including:

Child Sexual Exploitation (CSE)

Child Criminal Exploitation (CCE)

County Lines involvement

Female Genital Mutilation (FGM)

Forced Marriage

Radicalisation and Extremism

Online Grooming

These issues may present differently in international students and require particular sensitivity.

4.3 Expectations of All Adults

All adults working with children under UK Speeder Consulting Ltd must:

- Remain vigilant to possible signs of abuse or neglect.
 - Record factual observations (not personal opinion) as soon as possible.
 - Report any concerns immediately to the DSL or Deputy DSL, even if they are unsure whether the concern meets a specific threshold.
 - Avoid confronting alleged perpetrators or investigating independently — this is the role of statutory authorities.
-



5. Systems for Children to Report Abuse

UK Speeder Consulting Ltd ensures that every child in our care knows how to report concerns about their safety and wellbeing, and has access to multiple reporting routes in line with *Keeping Children Safe in Education (KCSIE) 2025*, Para 96, and *AEGIS Quality Standards* (Section 6.1.3).

You have the right to feel safe at all times.

If something is worrying you, if you feel unsafe, or if something has happened to you or a friend that doesn't feel right — please tell someone straight away.

5.1 Who You Can Talk To

You can contact any of the following trusted adults at any time:

Ms Xue Yan – Designated Safeguarding Lead (DSL)

Email: alexi.y@ukspeeder.com | Mobile (24/7): +44 7385335872

Junqi Yang – Deputy DSL / Educational Guardian

Email: jas.yang@ukspeeder.com | Mobile (24/7): +44 7598854558

A **teacher or trusted adult** at your school

Your **homestay provider**

Other ways to report a concern:

24/7 Safeguarding Contact Number: +44 7385335872 (monitored at all times)

Concerns can be reported **face-to-face**, **by phone**, **by email**, or **in writing**

You may also raise a concern **anonymously** — it will still be taken seriously and acted upon

5.2 External Support & Helplines

If you prefer to speak to someone outside the organisation, you can contact:

Childline – 0800 1111 (free, confidential, 24/7)

NSPCC Child Protection Helpline – 0808 800 5000

The Children's Commissioner – www.childrenscommissioner.gov.uk

NHS (Health Support) – 111



Police, Fire, or Ambulance – 999 (emergency only)

5.3 What Will Happen When You Speak Up

When you tell us something that worries you:

We will listen to you carefully and take you seriously.

We will make sure you are safe.

We will only share your concern with the people who need to know in order to help you.

You will not get into trouble for speaking up, even if you're unsure whether something is "serious."

5.4 Visibility of Reporting Systems

This information is in your **Student Handbook** (Section: *Staying Safe: Safeguarding*).

Contact details are displayed in **welcome packs** and **common areas of homestays**.

Safeguarding posters are provided where possible to remind students of support options.

Safeguarding posters and contact cards are also provided to boarding school students at induction.

6. Procedures for Responding to Safeguarding Concerns

6.1. Immediate Action

If a child is in immediate danger or at risk of significant harm:

- Call **999** for the police or relevant emergency service.
 - Inform the Designated Safeguarding Lead (DSL) or Deputy DSL as soon as possible.
 - If neither is available, contact Children's Social Care directly (see Section 3 for LSP/LADO details).
-

6.2. Step-by-Step Reporting Procedure

Recognise – Identify a safeguarding concern (through observation, disclosure, or suspicion).

Respond – Stay calm, listen carefully, reassure the child, and avoid making promises you cannot keep (such as absolute confidentiality).

Report – Pass the concern immediately to the DSL (or Deputy DSL if DSL is unavailable).



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Record – Complete a written safeguarding concern form within **24 hours**, detailing:

- Date, time, and location of incident or concern
- Who was present
- What was said or observed (use the child's own words where possible)
- Your actions taken so far
- Your name, signature, and date

Refer – The DSL will:

Assess the concern against local safeguarding thresholds.

Decide whether to make a referral to:

- **Local Authority Designated Officer (LADO)** – for allegations against staff/homestays/volunteers.
- **Children's Social Care** – for child protection concerns.
- **Police** – for criminal offences.

Record all decisions and actions taken, with rationale.

Follow-Up – Maintain appropriate contact with the DSL for updates and next steps.

Outcomes – Following the DSL's decision:

If a referral is made: Children's Social Care will decide within one working day what further action is required, which may include an assessment, strategy discussion, or child protection enquiries. The organisation will cooperate fully with any investigations and provide further information as requested. Parents/carers will normally be informed of the referral unless doing so would place the child at risk of harm.

If a referral is not necessarily made: The DSL will record the decision and the rationale. The concern will be entered into the organisation's safeguarding log/chronology so that any future concerns can be linked and considered together. The case may be monitored internally, further information may be gathered, and/or early help may be offered to support the child and family. Staff should remain vigilant and immediately raise any new concerns with the DSL.

6.3 Handling Disclosures from Children

Listen carefully without interruption.

Reassure the child that they have done the right thing by speaking up.

Do not press for details or ask leading questions.

Explain who you must share the information with and why.

Report the disclosure immediately to the DSL (or Deputy DSL if the DSL is unavailable).



If the child is at immediate risk of harm, call 999 without delay.

Record the disclosure in writing as soon as possible, using the child's own words where appropriate, and submit this to the DSL.

Role of the DSL after receiving a disclosure:

- Review the information and assess the level of risk.
- Make a referral to Children's Social Care and/or the Police if the child is at risk of significant harm.
- Keep accurate records of the concern, decisions, and actions taken.
- Ensure the child receives appropriate support and is kept informed in an age-appropriate way.
- Inform parents/carers unless doing so would place the child at further risk of harm.

6.4 Child-on-Child Abuse (including Sexual Violence and Sexual Harassment) Procedures

The organisation recognises that children may be harmed by other children. All concerns, allegations or disclosures of child-on-child abuse will be taken seriously and never dismissed as "banter" or "part of growing up." This includes, but is not limited to, bullying, physical abuse, online abuse, sexual violence and sexual harassment.

Immediate safeguarding:

- Any child who has experienced, or is alleged to have experienced, abuse will be offered appropriate support and protection.
- The immediate safety and welfare of the child will be prioritised.
- Where necessary, measures will be put in place to ensure separation and reduce ongoing risk.

Assessment and response:

- The DSL will record the concern, assess the level of risk, and determine the appropriate course of action.
- In cases of **sexual violence**, the DSL will refer the matter to Children's Social Care and/or the Police.
- In cases of **sexual harassment**, the DSL will consider the nature, context, and severity of the behaviour, and decide whether to manage internally, refer to external agencies, or provide early help.
- Both the victim and the alleged perpetrator will be supported, recognising that each may have safeguarding and welfare needs.

Recording and monitoring:

- All incidents will be fully documented, including decisions, rationale, and follow-up actions.
- Patterns of behaviour will be monitored and further action taken if concerns persist.

Principles:

- All responses will follow the guidance set out in **Part 5 Child-on-child sexual violence and sexual harassment of KCSIE 2025**.
- Victims will be taken seriously, kept safe, and offered ongoing support.



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- Alleged perpetrators will also be assessed for risk and support needs, with a focus on safeguarding rather than punishment alone.
- Parents/carers will normally be informed unless doing so would place a child at risk of harm.

6.5 Allegations of Abuse Against Staff, Homestay Providers, or Volunteers

The organisation takes all allegations against staff, homestay providers, and volunteers seriously. Allegations may relate to behaviour inside or outside of work and may meet or fall below the harm threshold.

Allegations that meet the harm threshold

An allegation meets the threshold if it suggests that an adult has:

- behaved in a way that has harmed, or may have harmed, a child;
- possibly committed a criminal offence against, or related to, a child; or
- behaved in a way that indicates they may pose a risk of harm to children.

In such cases:

- The DSL and/or Director will contact the **Local Authority Designated Officer (LADO)** without delay.
- The organisation will follow the LADO's advice, including participation in strategy meetings, internal investigation, suspension if required, and next steps.
- Where a person is dismissed, suspended, or resigns because they pose a risk of harm to children, the organisation will make a referral to the **Disclosure and Barring Service (DBS)** as legally required.
- Regulatory or oversight bodies (such as AEGIS, Ofsted, or the Charity Commission if applicable) will also be notified where appropriate.

Concerns that do not meet the harm threshold:

Concerns that fall below the threshold will be managed in line with the organisation's **Low-Level Concerns Policy**.

All low-level concerns will be recorded, monitored and addressed appropriately, with the aim of promoting a safe culture and early intervention.

Recording and Confidentiality

- All allegations, decisions, and actions will be recorded with clear rationale.
- Confidentiality will be maintained as far as possible, and information will only be shared with those who need to know in order to safeguard children or manage the process.

6.6 Confidentiality

Information will only be shared with those who need to know to protect the child.

All records are stored securely in accordance with our **Data Protection and Privacy Policy**.



6.7 Escalation

If you believe your concern has not been taken seriously or acted upon appropriately, you must escalate:

Raise the matter with a senior manager or Director.

Contact the relevant **LADO** or **Local Safeguarding Partner** directly (see Section 3).

Seek independent advice from **NSPCC** (0808 800 5000).

7. Record Keeping, Confidentiality & Information Sharing

7.1. Purpose

Accurate, secure, and timely record keeping is an essential part of safeguarding practice. Records help monitor concerns, identify patterns, and support referrals to external agencies.

7.2. Recording Safeguarding Concerns

All safeguarding concerns, incidents, and referrals must be documented using the **Safeguarding Concern Form** (available from the DSL).

Each record must include:

- Date, time, and location of the incident or disclosure
- Names of those involved (including witnesses)
- Factual account of what happened, using the child's own words where possible
- Actions taken and by whom
- DSL's decision and rationale for any action or referral
- Signature, name, and date of the person making the report.

Reports must be signed and dated by the person making them.

7.3. Storage & Access

Safeguarding records are kept **securely and separately** from general student files.

Digital records are stored in secure, encrypted folders with restricted access.

Physical records are stored in locked cabinets in a secure office.

Access is strictly limited to the **Designated Safeguarding Lead (DSL)**, **Deputy DSL**, **Director**, or other authorised personnel as required by law.



7.4. Confidentiality

Safeguarding records are **confidential** and will only be shared on a **need-to-know** basis in line with safeguarding procedures, statutory guidance, and the Data Protection Act 2018.

Parental consent will be sought where possible before sharing information, unless doing so would place a child at risk of harm (KCSIE para 118).

7.5. Information Sharing

We follow the principles in *Working Together to Safeguard Children* and the *Data Protection Act 2018*.

All disclosures to third parties will be logged, including **date, recipient, and purpose**.

Information will only be shared with relevant professionals who require it to protect a child.

Where applicable, the DSL will record the justification for information sharing decisions (whether consent was obtained or overridden).

7.6. Retention & Secure Disposal

Safeguarding records will be retained for a **minimum of 7 years** after the student leaves our care (or longer if required by law or ongoing proceedings).

When no longer required, records will be disposed of securely by **shredding** (for paper) or **permanent deletion** (for digital files).

8. Safer Recruitment Policy

8.1 Introduction

UK Speeder Consulting Ltd is committed to safeguarding and promoting the welfare of children and young people through **robust and consistent safer recruitment practices**. Recruitment is an essential part of our safeguarding framework — ensuring that only suitable people are allowed to work with, or host, children under our care.

This policy applies to the recruitment of all staff, volunteers, and homestays, including **all adult household members aged 16 and over**. It is written in accordance with:

Keeping Children Safe in Education (KCSIE) 2025 – Part 3

Working Together to Safeguard Children (2023)



The Safeguarding Vulnerable Groups Act 2006

The Rehabilitation of Offenders Act 1974 (Exceptions Order)

AEGIS Quality Standards (Standard 2.8)

8.2 Policy Aims

Prevent unsuitable individuals from working with or hosting children.

Maintain a consistent, thorough safer recruitment process.

Promote a culture of vigilance, transparency, and accountability in all appointments.

Integrate **Prevent Duty awareness** into recruitment to reduce risks of radicalisation.

8.3 Safer Recruitment Process

This policy applies to all appointments involving staff, volunteers, and homestays. The safer recruitment process includes:

- Application form screening
- Interview and motivation assessment (in line with KCSIE para 230)
- Identity verification and right to work checks
- Professional references (including comments on suitability for working with/hosting children)
- Enhanced DBS checks and Barred List checks
- Overseas checks (where applicable)
- Safeguarding risk assessment

All homestays undergo an **initial home visit** and safeguarding interview before approval, with follow-up visits at least annually.

Self-Declarations: In addition to enhanced DBS checks, all applicants (staff, volunteers, homestays) are required to complete a safeguarding self-declaration check (AEGIS Standard 5.1.2), confirming that they have no relevant criminal conviction or safeguarding concerns.

Motivation to Work with Children: As part of the recruitment and interview process, applicants will be asked to explain their motivation for working with or hosting children (in line with KCSIE para 230). This ensures that applicants demonstrate genuine interest in the welfare and development of young people, beyond financial considerations.



8.4 Safer Recruitment Training

At least **one member of every recruitment panel** who conducts an interview with the staff to work with children will have completed accredited Safer Recruitment Training in line with **KCSIE para 213 and AEGIS Quality Standard 2.8.2**.

Training is refreshed every 3 years, and training records are retained in staff files.

8.5 Interview Records

Comprehensive notes are recorded and securely retained in line with the **Record Keeping Policy** (AEGIS Standard 2.5).

8.6 References

Two written references obtained before appointment.

Staff/Volunteers: One must be from the most recent or current employer.

Homestays: At least one from a professional individual (no family references).

Referees must have known the candidate for at least 2 years.

References are verified for authenticity and consistency.

In line with KCSIE para 230, referees will also be asked to comment on the applicant's suitability and motivation for working with or hosting children, including their values, attitude to safeguarding, and ability to establish appropriate professional boundaries.

Any concerns trigger a follow-up phone check and are recorded in the safeguarding log.

8.7 DBS & Barred List Checks

All staff and volunteers who are required to have face-to face duty with children, and homestays (including household members aged 16+) require an **enhanced DBS** before starting.

Certificates renewed every 3 years, or checked annually via the **DBS Update Service**.

For regulated activity roles, a **Children's Barred List check** is also undertaken (with written consent).

Records maintained of check date, certificate number, and issue date.



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For applicants with criminal convictions, where a DBS certificate or overseas police check lists a previous conviction (including safeguarding-related offences), UK Speeder Consulting Ltd will not make automatic determinations. Instead, a written risk assessment will be carried out in accordance with AEGIS Standard 2.8.7 and UKVI guidance to determine suitability to work with or host children.

Decisions will consider the nature and seriousness of the offence, relevance to safeguarding, the time elapsed, and any legal restrictions.

If there is any doubt regarding suitability, the organisation will seek guidance from the appropriate Local Authority or regulatory body.

8.8 Handling Disclosures

Any criminal record information is risk assessed by the DSL and Managing Director.

If safeguarding concerns are identified, the **LADO will be consulted** before any appointment decision.

8.9 Overseas Checks

Required for anyone who has lived or worked abroad for **3+ months in the last 5 years** (KCSIE para 285 and AEGIS Quality Standard 2.8.8).

If checks are not available, enhanced references, additional interviews, and a risk assessment will be completed.

8.10 Identity & Right to Work Verification

ID Verification: All applicants must provide original identification documents. Wherever possible, the birth certificate will be used for ID verification, in line with KCSIE (para 237). Additional documents such as passports, driving licences, and proof of address will also be required.

Immigration Status: In line with UKVI requirements, all homestay providers must hold British citizenship, Indefinite Leave to Remain, or Settled Status with the legal right to reside in the UK. Proof of immigration status will be verified during the recruitment process.

Date of check and copies retained securely in compliance with **Data Protection**.

8.11 Online Due Diligence

Publicly available online information is reviewed for all shortlisted candidates (KCSIE para 225).



Relevant findings discussed at interview and recorded in the recruitment file.

8.12 Allegations Against Staff, Volunteers, or Homestay Providers

Allegations made against staff, volunteers, or homestay providers are not covered in this policy. They are managed under the organisation's Safeguarding and Child Protection Policy (see Section 6.5 of this document), which sets out procedures for both allegations that meet the harm threshold and those that do not.

8.13 Confidentiality & Record Retention

All recruitment records are stored securely and retained for a minimum of **7 years** after the end of the appointment.

All information is handled in line with **UK GDPR** and the Data Protection Act 2018.

8.14 Review

This policy will be reviewed annually, or sooner if there are changes to statutory guidance or AEGIS requirements.

9. Code of Conduct for Staff, Volunteers & Homestays

UK Speeder Consulting Ltd maintains a detailed **Staff Code of Conduct** (see separate document) which sets out the professional behaviour standards expected from all adults working with or hosting students.

This Code of Conduct forms part of our safeguarding arrangements and covers:

- Professional boundaries and positions of trust
- Communication, physical contact, and privacy
- Social media and image use
- Transporting students
- Reporting concerns and low-level concerns

All staff, volunteers must confirm they have read and will adhere to the Code of Conduct. Breaches will be dealt with under safeguarding and disciplinary procedures.



10. Homestay Code of Conduct

Purpose

To set clear standards for homestay hosts to ensure the safety, wellbeing, and positive experience of all students under the care of UK Speeder Consulting Ltd.

10.1 Safeguarding and Duty of Care

- Always prioritise the student's safety and wellbeing.
 - Act in line with our Safeguarding & Child Protection Policy.
 - Report any safeguarding concerns immediately to the DSL.
-

10.2 Behaviour and Boundaries

- Provide a caring, respectful, and inclusive home environment.
 - Maintain appropriate adult-child boundaries at all times.
 - Do not use physical punishment, aggressive language, or humiliating behaviour.
-

10.3 Communication

- Keep regular, open communication with the student and UK Speeder Consulting Ltd.
 - Inform us immediately if there are any concerns about the student's welfare, behaviour, or attendance.
-

10.4 Privacy and Accommodation

- Provide the student with their own clean, safe, and appropriately furnished bedroom.
 - Respect the student's privacy while ensuring their safety.
 - Ensure the home environment is smoke-free indoors and free from illegal substances.
-

10.5 Meals and Daily Life

- Provide regular, nutritious meals, including for special dietary needs.
 - Include the student in normal family routines and activities where possible.
-



10.6 Transport and Supervision

- Ensure the student has safe travel to and from school or activities.
 - Follow all agreed travel arrangements with UK Speeder Consulting Ltd.
 - Never leave the student unsupervised overnight.
-

10.7 Internet and Online Safety

- Provide safe and filtered internet access.
 - Support and monitor the student's online safety in line with our Online Safety & E-Safeguarding Policy.
-

10.8 Cultural Sensitivity

- Be respectful of the student's cultural background, religion, and beliefs.
 - Encourage the student to share their culture while helping them adapt to life in the UK.
-

10.9 Confidentiality

Do not share personal information about the student outside the homestay, except as required for safeguarding purposes.

11. Low-Level Concerns Policy

11.1 Introduction

At UK Speeder Consulting Ltd, safeguarding is our highest priority. This policy outlines our approach to identifying, recording, and managing low-level concerns. It complements our overarching Safeguarding and Child Protection Policy and complies with Section 6.5 of the guardianship standards and guidance in *Keeping Children Safe in Education* (KCSIE 2025).

This policy should be read alongside our **Allegations Against Staff, Volunteers, or Homestay Providers** policy, which outlines the process for managing more serious concerns that meet the formal allegation threshold.



11.2 Purpose of the Policy

This policy aims to:

- Create a culture where all concerns about adults' conduct with children – no matter how minor – are shared responsibly.
 - Encourage early reporting to enable appropriate and proportionate responses.
 - Ensure all concerns are recorded and reviewed to identify potential patterns of inappropriate behaviour.
-

11.3 Definition of a Low-Level Concern

A low-level concern is any concern – no matter how small – that an adult working with or around children may have acted in a way that:

- Is inconsistent with the organisation's Code of Conduct;
- Does not meet the threshold for reporting an allegation (as defined in the KCSIE 2025 Part Four; i.e. behaviour that has harmed or may have harmed a child; possibly committed a criminal offence against a child; indicates a risk of harm to children; or indicates that the person may not be suitable to work with children);
- May cause a sense of unease or 'nagging doubt' about the adult's behaviour.

Examples of low-level concerns may include:

- Using inappropriate language around or to a child;
- Having unnecessary physical contact;
- Being overly familiar or seeking one-to-one contact without justification;
- Failing to maintain appropriate professional boundaries.

Such concerns must still be reported to the DSL, recorded, and addressed in line with this policy, even if they appear minor at the time.

11.4 Responsibilities of Staff, Volunteers, and Homestays

All adults working with children – including staff, volunteers, and homestays – are expected to:

- Report any low-level concern they have about a colleague, volunteer, or homestay.
- Self-report any situation where their own behaviour may be perceived as inappropriate or could be misconstrued.
- Understand that reporting low-level concerns helps protect children and adults alike and contributes to a culture of transparency and safety.



11.5 Reporting Low-Level Concerns

Low-level concerns should be reported as soon as possible to the Designated Safeguarding Lead (DSL) or a senior manager.

The following information should be shared:

- What the concern is;
 - Who the concern is about;
 - When and where it took place;
 - Whether the individual is self-reporting.
 - Reports may be made verbally or in writing. Staff are encouraged to use the organisation's Low-Level Concern Record Form (available from the DSL).
-

11.6 Recording and Managing Low-Level Concerns

All concerns will be:

- Recorded in a dedicated Low-Level Concerns Log;
- Reviewed and assessed by the DSL or safeguarding team;
- Addressed through informal advice, reflective practice, or more formal interventions if appropriate.

Records will include:

- Date of concern;
 - Name of individual raising the concern;
 - Nature of the concern;
 - Action taken and rationale;
 - Whether the concern was reviewed in isolation or alongside previous reports.
-

11.7 Self-Reporting Expectations

UK Speeder Consulting Ltd encourages staff, homestays, and volunteers to self-report:

- Any behaviour that could be misinterpreted or viewed as crossing professional boundaries;
- Any situation where they believe they may have fallen short of the expected standard.
- This helps protect individuals from potential allegations and promotes a culture of openness and accountability.



11.8 Thresholds and Escalation

If, upon review, a concern appears more serious or meets the threshold of a safeguarding allegation, it will be managed in line with our Safeguarding and Child Protection Policy and referred to the Local Authority Designated Officer (LADO) or relevant authorities.

11.9 Reporting to AEGIS

UK Speeder Consulting Ltd is committed to transparency with AEGIS. We will self-report any significant safeguarding concerns or situations where:

- Behaviour may be misconstrued or appear compromising;
 - Standards of conduct have fallen below expectations.
-

11.10 Confidentiality and Data Protection

All low-level concerns will be handled in confidence and stored securely in line with our Data Protection Policy. Records will be retained in accordance with our safeguarding record-keeping procedures.

11.11 Review of Policy

This policy will be reviewed annually or when changes are made to safeguarding guidance or best practices.

12. Travel & Transport Policy

UK Speeder Consulting Ltd ensures that all transport arrangements for students are safe, supervised, and fully compliant with our safeguarding responsibilities.

12.1 Approved Transport Providers

- All student journeys arranged by UK Speeder Consulting Ltd will be carried out through approved third-party transport providers, such as Westfield Minibuses or other licensed taxi/minibus companies. These providers are required to ensure that:
- All drivers hold an Enhanced DBS clearance (with child workforce and barred list checks).
- Vehicles are appropriately licensed, insured, and regularly maintained for passenger transport.
- Drivers have safeguarding awareness and follow our safeguarding requirements.



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- Where our primary provider (e.g. Westfield Minibuses) is unavailable, UK Speeder Consulting Ltd will use an alternative licensed transport company that meets the same safeguarding and compliance standards (Enhanced DBS drivers, full passenger insurance, safeguarding awareness).
-

12.2 Role of DSL/Deputy DSL in Transport

All journeys must be arranged in advance by the DSL or Deputy DSL.

- Wherever possible, the DSL/Deputy DSL will accompany the student during the journey, particularly for airport transfers and long-distance travel.
 - Where accompaniment is not possible, the DSL/Deputy DSL will ensure safe handover procedures, including driver identification, meeting inside the terminal/school, and parental confirmation.
-

12.3 Types of Journeys Covered

Airport transfers at the start/end of term

Travel between school and homestay

Educational visits and trips

Emergency travel arrangements

12.4 Safeguarding During Travel

Students will always be met inside the terminal/school and escorted to the vehicle.

Students will sit in the rear passenger seats and must wear seatbelts at all times.

Students will never travel alone with an unvetted adult or unauthorised driver.

12.5 Record Keeping

For every journey, UK Speeder Consulting Ltd will record:

- Student's full name
- Date and time of travel
- Pick-up and drop-off locations
- Confirmation of parental consent (via signed form, email, or written message)



12.6 Emergencies

If travel plans change unexpectedly (delays, cancellations, missed connections), the student must contact the DSL or Deputy DSL immediately. UK Speeder Consulting Ltd will inform the parent/guardian and arrange safe alternatives.

12.7 Policy Links

This Travel & Transport Policy should be read in conjunction with our Safeguarding & Child Protection Policy, particularly the sections on safer recruitment, allegations management, and emergency safeguarding cover.

13. Missing Student Policy

13.1 Purpose and Scope

This policy sets out the procedures to be followed by staff, volunteers, and homestays of UK Speeder Consulting Ltd in the event that a student goes missing. The aim is to ensure the safety and swift recovery of any student whose whereabouts are unknown. This policy draws on best practice from guidance issued to children's homes and is aligned with the guidance in Children Missing from Education where applicable.

13.2 Applicability

This policy applies to all students under the care of UK Speeder Consulting Ltd, including those placed with homestays, attending schools, or participating in activities organised or overseen by the guardianship organisation.

13.3 Preventative Measures

- Students are informed of expectations around communication and curfew.
 - Homestays and staff maintain regular contact with students and monitor attendance at school and activities.
 - All student contact information, including medical and emergency details, is kept up to date.
 - Students are provided with emergency contact details for the organisation.
-



13.4 Definition of a Missing Student or Absent student

Missing Student: A student is considered missing if their whereabouts are unknown and there are concerns for their safety. This includes situations such as:

- failure to return home at an expected time,
- missing school without explanation, or
- loss of contact while travelling or in homestay.
- Going out unaccompanied without permission and failing to make contact with the homestay or guardian,
- Failure to return home by the designated curfew time

Absent Student: A student is considered absent if they are not at the place where they are expected or required to be, but there is no apparent safeguarding risk. Examples include lateness, travel delays, or illness reported by parents/homestay.

*Note: All absences must still be monitored and recorded. If an absence gives rise to a safeguarding concern, it should immediately be escalated and treated as a missing student case.

This definition is aligned with statutory guidance Children Missing Education (2025):

[Children Missing Education – Statutory Guidance for Local Authorities and Schools](#)

13.5 Immediate Actions to Be Taken

Timescales (10/20/30 minutes) are guidelines to support swift action. If at any point there is reason to believe the child is at immediate risk, staff must escalate to the police without delay.

If a student is found to be missing, this must be reported immediately, regardless of whether it occurs during term time, outside of normal school hours, at weekends, during holidays, while travelling, or while in homestay.

During term time (including evenings and weekends when the student is under the care of the school as a boarder), the Designated Safeguarding Lead (DSL) at the school and the UK Speeder Consulting Ltd DSL must both be notified immediately.

If the student is missing outside of term time or when guardianship has direct responsibility (e.g. in homestay, during travel, or holiday arrangements), the UK Speeder Consulting Ltd DSL must be notified immediately, who will then also inform the school (where appropriate), the parents, the police, and any other relevant agencies.

In all cases, the school will be notified as a safeguarding partner, unless specifically instructed otherwise by the police or statutory services. All incidents of a missing student will be recorded, and immediate safeguarding action will be taken in line with statutory guidance and the organisation's safeguarding procedures.

Within 10 minutes of concern being raised:

Attempt to contact the student directly via phone, messaging, or known contacts.



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Check with friends, school staff, and local contacts for possible information.

Confirm with school or homestay whether the student has signed in/out.

Within 20 minutes if still missing:

4. Notify UK Speeder Consulting Ltd via the 24-hour emergency contact number (DSL or Deputy DSL).

5. Homestays or staff should conduct a safe and local search if appropriate.

6. Inform the student's parents/guardians that a concern has been raised.

Within 30 minutes if still missing:

7. If the student cannot be located and there are ongoing concerns, report the matter to the local police immediately (dial 999).

8. Provide police with:

Student's full name, date of birth, and description (including clothing)

Last known location and time

Any relevant health or safety concerns

Your contact details

Request a police incident number for records.

13.6 24-Hour Contact

DSL: Ms Xue Yan, +44 7385335872, alexi.y@ukspeeder.com

Deputy DSL: Mr Junqi Yang, +44 07598854558, jas.yang@ukspeeder.com

13.7 Aftercare and Follow-Up

Once the student has been located:

Ensure they receive appropriate care, medical attention if needed, and emotional support.

Conduct a debrief meeting with the student to establish what happened and whether further safeguarding action is needed.



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Record the incident in the safeguarding log, including all actions taken, times, and people contacted.

Review the circumstances and update risk assessments.

Consider whether a referral to Children's Services is required.

13.8 Communication and Training

This policy is shared with all staff, volunteers, and homestays, and is available to parents and partner schools upon request. All relevant individuals are trained to understand and implement this procedure.

13.9 Missing Child in Transit

This procedure applies when a student fails to arrive as expected during travel, transfers, or excursions organised or overseen by UK Speeder Consulting Ltd.

Immediate Actions

- Check the agreed meeting point and time.
- Attempt to contact the student directly (phone, text, messaging apps).
- Contact the driver, homestay, or school to confirm if the student has been seen or collected.

Escalation (within 15–30 minutes)

- Notify the Designated Safeguarding Lead (DSL) or Deputy DSL.
- Inform the parent/guardian immediately.
- If the student is still not located, contact the police without delay.

During Excursions

- The trip leader conducts headcounts at all key points (departure, arrival, re-boarding transport).
- If a student is missing, another adult supervises the group while the leader follows Immediate Actions above.

Documentation

- Record all actions and times in the safeguarding log.
- Complete an incident report and review relevant risk assessments.

Prevention Measures

- Ensure all students know the meeting point, emergency contact numbers, and what to do if separated.
- Provide each student with a card showing the UK Speeder Consulting Ltd 24-hour emergency number.



13.10 Review and Updates

This policy is reviewed annually or following any incident involving a missing student to ensure it remains effective and up to date. This policy complies with AEGIS Quality Standard 6.7 and KCSIE 2025 guidance on children missing from education.

Cross-reference:

For all external safeguarding contacts, including Local Authority Designated Officers (LADOs), see Section 3: LADO Contact Details.

14. Emergency Response Summary

UK Speeder Consulting Ltd has a separate Emergency Procedure document outlining our 24-hour contact arrangements, coverage, and step-by-step guidance for handling a range of emergencies, including safeguarding incidents, missing students, medical crises, accommodation issues, and travel disruptions.

This summary aligns with Keeping Children Safe in Education (KCSIE 2025, Part 2: The Management of Safeguarding) and the AEGIS Quality Standards (Standard 2.6: 24/7 emergency response arrangements).

Key Safeguarding Principles

In any safeguarding-related emergency, the Designated Safeguarding Lead (DSL) or Deputy DSL will be informed immediately.

Parents/guardians, schools, and where relevant, Local Safeguarding Partners (LSPs) or the Local Authority Designated Officer (LADO) will also be informed promptly, in line with our safeguarding procedures.

The emergency procedure ensures safeguarding remains central to all decision-making, including risk assessments, communication, and aftercare.

Accessibility: All staff, homestays, and volunteers are trained in emergency procedures and have access to the 24-hour emergency contact number.

The Emergency Procedure is included in the Staff and Homestay Handbook and summarised in the Student Handbook (Staying Safe section), so students also know how to respond in an emergency.

The full Emergency Procedure is available to all stakeholders upon request.

Review

The Emergency Procedure is reviewed annually or following a serious incident, ensuring it remains current, effective, and fully compliant with safeguarding best practice.



15. Whistleblowing Policy

15.1 Introduction

UK Speeder Consulting Ltd is committed to the highest standards of openness, integrity, and accountability. This Whistleblowing Policy enables staff, volunteers, and homestays to raise concerns about wrongdoing, unlawful conduct, or failures in safeguarding without fear of reprisal. Concerns that relate to the safety or welfare of children will always be treated as a matter of highest priority and addressed immediately.

This policy aligns with Section 6.4 of the Guardianship Organisation Quality Standards and ensures that any concerns about malpractice, particularly those involving the safety or welfare of children, can be raised and addressed appropriately — including by bypassing the normal reporting hierarchy if there is an immediate risk to a child. This policy should be read alongside Section 6: Procedures for Responding to Safeguarding Concerns, and Section 11: Low-Level Concerns Policy.

15.2 Purpose of the Policy

The purpose of this policy is to:

- Encourage staff, volunteers, and homestays to report concerns about wrongdoing, risk, or malpractice.
- Protect whistleblowers from retaliation or disadvantage when raising concerns in good faith.
- Outline how such concerns will be handled within the organisation.
- Ensure all individuals understand their rights and options if internal reporting is not appropriate.

15.3 Scope of the Policy

This policy applies to:

All employees and volunteers of UK Speeder Consulting Ltd

All homestay providers and their household members

Any third-party contractors or service providers engaged with our organisation



15.4 What is Whistleblowing?

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to the organisation's activities. This may include:

- Criminal offences
- Misconduct or professional malpractice
- Child protection or safeguarding failures
- Health and safety risks
- Deliberate concealment of any of the above

This policy is not intended for personal grievances (which should be addressed through the complaints or grievance procedures).

15.5 Our Commitment to Whistleblowers

- You will not suffer any form of retaliation or victimisation as a result of raising a genuine concern, even if it turns out to be mistaken.
 - We will treat all disclosures sensitively, keeping your identity confidential wherever possible.
 - We will take all concerns seriously and investigate them appropriately and fairly.
-

15.6 How to Raise a Concern

If you have a concern about any aspect of safeguarding, misconduct, or unlawful activity, you should:

Report the concern to:

Ms Xue Yan – Designated Safeguarding Lead (DSL)
alexi.y@ukspeeder.com | +44 7385335872 (24/7)

Mr Junqi Yang – Deputy DSL
jas.yang@ukspeeder.com | +44 7598854558 (24/7)

Or another senior manager within UK Speeder Consulting Ltd.

Anonymous Reporting: Concerns may be raised anonymously. Such concerns will always be taken seriously and investigated as far as possible. However, anonymous reports may limit our ability to gather further information or provide feedback on the outcome.

Escalation: If the concern involves your direct manager, the safeguarding lead, or you do not feel comfortable raising it internally, you may go directly to a director. Clearly explain the facts, reasons for your concern, and any supporting evidence you may have.



Timeframes:

1. All concerns will be acknowledged within **2 working days**.
2. An initial assessment will be carried out within **5 working days** to determine if a full investigation is needed.

External Reporting: Concerns may also be raised directly with AEGIS during inspection. This option will be clearly communicated to staff and homestays.

15.7 External Whistleblowing Advice and Support

If being unable to raise a concern internally, staff may also raise concerns directly with the Local Safeguarding Partnership (LSP) or with AEGIS if they believe the issue has not been adequately addressed internally.

Local Safeguarding Partnership (details listed in Section 3 of this document)

AEGIS: Association for the Education and Guardianship of International Students

info@aegisuk.net

+44 (0)1453 821293

Independent organisations offer support:

NSPCC Whistleblowing Helpline

For concerns about child protection failures in any organisation

Phone: 0800 028 0285 (8am–8pm Monday to Friday)

Email: help@nspcc.org.uk

Protect (formerly Public Concern at Work)

Free, independent, and confidential advice for individuals unsure about whether or how to whistleblow

Phone: 020 3117 2520

Website: www.protectadvice.org.uk

15.8 What Will Happen After You Raise a Concern

Your concern will be acknowledged within 2 working days.



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A preliminary assessment will be carried out within 5 working days to decide whether a full investigation is required.

If a formal investigation is necessary, it will be conducted swiftly, fairly, and by an impartial individual or panel.

All concerns will be securely recorded.

You will be informed of the outcome wherever appropriate and legally permissible.

Anonymous concerns will also be recorded and investigated as far as possible, but anonymity may limit the ability to seek clarification or provide feedback.

15.9 Recording of Concerns and Outcomes

All whistleblowing concerns will be recorded by the DSL (or Deputy DSL) in a secure safeguarding log. Each record will include:

- The nature of the concern raised
- The date and method of reporting
- Actions taken to investigate
- The outcome of the investigation
- The reasons/rationale for the decision reached

Records will be stored confidentially and securely, with access restricted to the DSL, senior management, and external agencies where legally required.

15.10 Confidentiality and Anonymous Reporting

All concerns raised under this policy will be treated in the strictest confidence. The identity of the whistleblower will not be disclosed without their consent, unless required by law.

Concerns may also be raised anonymously. Anonymous concerns will be accepted and recorded by the DSL, and investigated as far as possible using the information provided. Such reports will always be taken seriously and treated in line with safeguarding standards.

However, anonymity may limit the ability to clarify details or to provide feedback on the outcome.

15.11 False Allegations

Anyone who deliberately makes false or malicious allegations may be subject to disciplinary action. However, if you raise a concern in good faith that turns out to be unfounded, you will not face any consequences.



15.12 Training and Awareness

All staff, volunteers, and homestays receive training on this policy during induction and at regular safeguarding refreshers.

15.13 Review of Policy

This policy will be reviewed annually or in line with changes to legislation, guidance, or operational procedures

16. Online Safety & E-Safeguarding Policy

16.1 Policy Statement

UK Speeder Consulting Ltd recognises the importance of promoting a safe and responsible online environment for all students. Online safety is a core part of our safeguarding responsibilities and is integrated into our overall Safeguarding and Child Protection Policy.

16.2 Scope

This policy applies to all students under our guardianship, as well as staff, volunteers, and homestays. It covers all use of the internet, social media, messaging platforms, digital devices, and online resources during the period of guardianship, whether at school, in the homestay, or elsewhere.

16.3 Objectives

- Protect students from harmful or inappropriate online content and contact.
 - Educate students and homestays on responsible and safe online behaviour.
 - Establish clear reporting procedures for online safety concerns.
 - Work in partnership with schools, parents, and local authorities to safeguard children online.
-

16.4 Online Safety Expectations for Students

Students must:

- Use the internet and social media respectfully and responsibly.
- Never share personal information such as full name, address, school, or location.



- Never agree to meet someone in person whom they have only met online.
 - Report any inappropriate messages, content, or contact to a trusted adult (DSL, Deputy DSL, homestay, or teacher) immediately.
 - Avoid engaging in cyberbullying, harassment, sexting, or sharing offensive material.
 - Follow school ICT and acceptable use policies.
-

16.5 Recognising Signs of Online Abuse and Harmful Behaviour

Staff, homestays, and volunteers should be alert to the following **possible indicators** of online abuse, grooming, cyberbullying, or harmful behaviours:

General online abuse warning signs

- Sudden withdrawal from friends, family, or usual activities
- Secretive behaviour when online, or reluctance to share what they are doing on devices
- Excessive time spent online, particularly late at night
- Becoming anxious, upset, or angry after using the internet or social media
- Unexplained gifts, money, or possessions

Possible signs of grooming

- Receiving frequent messages from unknown adults or older individuals
- Talking about a new “friend” met online, whose details are vague or inconsistent
- Reluctance to talk about online contacts or activities
- Signs of manipulation, flattery, or pressure to keep secrets

Possible signs of cyberbullying

- Avoiding school or social situations without clear reason
- Visible distress after checking phone or computer
- Sudden changes in friendship groups or online contacts
- Declining academic performance linked to stress or anxiety

Possible signs of exposure to harmful content

- Repeatedly viewing violent, sexual, or extremist material
- Use of language, ideas, or behaviours that reflect harmful online influences
- Expressing hopelessness, self-harm, or extremist views linked to online content

Exposure to Misinformation, Disinformation and Conspiracy Theories

In accordance with Keeping Children Safe in Education (KCSIE) 2025, UK Speeder Consulting Ltd recognises that misinformation, disinformation and conspiracy theories encountered online are considered forms of safeguarding harm.



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- Such content can mislead or manipulate young people, influence their beliefs or behaviours, and contribute to anxiety, mistrust or unsafe decision-making.
- Staff, homestays and volunteers should:
- Be alert to signs that a student may have been exposed to misleading or harmful online information.
- Encourage critical thinking and discussion about reliable sources and digital safety.
- Report any concerns immediately to the DSL or Deputy DSL, following safeguarding reporting procedures.

*Note: The presence of one or more of these signs may not prove that a child is experiencing online abuse, but staff and homestays should record the concern and immediately report it to the DSL for assessment.

16.6 Responsibilities of Staff and Homestays

- Ensure safe and age-appropriate internet access in the homestay, including parental controls where relevant.
- Monitor students' online activity where appropriate, especially for younger children.
- Be alert to signs of online abuse, grooming, cyberbullying, or harmful behaviours.
- Be alert to online risks of radicalisation and extremism, and report any concerns immediately to the DSL.
- Encourage open conversations about internet use.
- Report any online safeguarding concerns to the DSL or Deputy DSL immediately.

16.7 Education and Awareness

Students receive guidance on online safety through handbooks, welcome packs, and ongoing discussions.

Staff and homestays receive training on online safety risks, including cyberbullying, grooming, sexting, and exposure to harmful content.

We signpost to recognised resources such as:

- ThinkUKnow (www.thinkuknow.co.uk)
- Childline (0800 1111)
- NSPCC (www.nspcc.org.uk)

16.8 Reporting and Responding to Online Safety Incidents

All online safety incidents will be treated as safeguarding matters. This includes cyberbullying, grooming, sexting, or exposure to harmful content.

All online safety concerns will be recorded in the safeguarding log and cross-referenced with other safeguarding records to identify any emerging patterns.

Contact the DSL or Deputy DSL immediately:



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DSL: Ms Xue Yan – alexi.y@ukspeeder.com | +44 7385335872 (24/7)

Deputy DSL: Mr Junqi Yang – jas.yang@ukspeeder.com | +44 7598854558 (24/7)

Actions may include:

- Speaking with the student involved
- Contacting parents/guardians
- Notifying the school
- Involving external authorities, including the police or LADO, where appropriate

All incidents will be recorded in the safeguarding log, including actions taken and outcomes.

16.9 Post-Incident Support

- Students affected by online harm will be offered support, including signposting to counselling or helplines.
 - We will work with parents, schools, and relevant agencies to reduce future risk.
-

16.10 Communication and Availability

This policy is shared with all staff, homestays, and volunteers, and is available to students and parents upon request. Key points are included in student and homestay welcome materials.

16.11 Review and Updates

This policy will be reviewed annually or after any major incident or technological development that may impact online safety.

17. Photography, Video & Social Media Policy

17.1 Purpose

The purpose of this policy is to ensure that the use of photographs, video recordings, and social media by UK Speeder Consulting Ltd is safe, respectful, and compliant with safeguarding, privacy, and data protection laws.



17.2 Scope

This policy applies to:

- All staff, volunteers, and homestays
 - All students under our guardianship
 - Any contractors or third parties working on behalf of the company
-

17.3 Consent Requirements

- Written, informed consent must be obtained from parents/guardians before taking or using any photographs or videos of students.
 - Consent must specify the purpose and platforms where the images will be used (e.g., website, printed materials, social media).
 - Records of consent will be securely stored and reviewed annually.
 - Students have the right to withdraw consent at any time.
-

17.4 Acceptable Use

- Only use images/videos for the purposes agreed in the consent form.
 - Avoid using students' full names alongside images in any public context.
 - Images must present students in a positive, safe, and respectful manner.
 - Only approved staff may post images to official UK Speeder Consulting Ltd platforms.
-

17.5 Prohibited Use

- No personal mobile phones or private social media accounts are to be used for photographing or filming students.
 - No sharing of student images/videos on personal accounts or in closed/private groups without explicit written permission from the DSL.
 - No images/videos of students in swimwear or situations that could be seen as compromising.
-

17.6 Storage and Security

- Digital files must be stored on secure, password-protected devices or systems.
- Paper prints must be kept in locked storage when not in use.
- Images will be retained only for as long as necessary and then securely deleted.



17.7 Social Media Guidelines

- Staff, volunteers, and homestays must maintain professional boundaries online.
 - No “friending” or direct messaging of students via personal accounts.
 - All official social media content must be approved by a designated manager.
-

17.8 Reporting Concerns

Any inappropriate use of images, videos, or social media must be reported immediately to the Designated Safeguarding Lead (DSL). Breaches will be treated as a safeguarding concern and may result in disciplinary action.

17.9 Review

This policy will be reviewed annually or in response to changes in legislation or best practice.

18. Anti-Bullying Policy

18.1 Policy Statement

UK Speeder Consulting Ltd is committed to providing a safe, supportive, and inclusive environment for all students under our care. We take a **zero-tolerance** approach to bullying of any kind, including cyberbullying. This policy outlines our responsibilities and procedures in preventing and addressing bullying, and in supporting those affected.

18.2 Definitions

Definitions of Bullying

Bullying may take many forms, including but not limited to:

- **Physical bullying** – hitting, pushing, or causing physical harm.
- **Verbal bullying** – name-calling, insults, threats, or offensive comments.
- **Relational bullying** – deliberate exclusion, spreading rumours, or manipulation of friendships.
- **Cyberbullying** – bullying carried out via digital means, including social media, messaging platforms, gaming platforms, and email (see section 18.6).



18.3 Scope

This policy applies to all students, staff, volunteers, and homestays involved with UK Speeder Consulting Ltd. It covers incidents occurring:

- At school
 - In the homestay
 - During travel or trips
 - At social activities
 - Online or via digital platforms
-

18.4 Preventative Measures

The organisation is committed to creating a safe and inclusive environment where all forms of bullying are recognised, challenged, and prevented. Prevention is achieved through clear policies, staff training, student education, and fostering a culture of respect and inclusion.

Who May Be at Greater Risk

The organisation recognises that certain groups of students may be more vulnerable to bullying and therefore require particular attention and support. These include, but are not limited to:

- Students from minority ethnic backgrounds or of different race/colour.
- Students of minority religions or cultural identities.
- Students who identify as LGBTQ+ (sexual orientation, gender identity, or gender expression).
- Students with disabilities or special educational needs (SEN).
- International students and those who are new to the school/organisation.

Preventative Actions

- Embedding respect and inclusion in the curriculum and daily practice.
 - Providing regular awareness and safeguarding training for staff.
 - Delivering workshops and education sessions for students on bullying, online safety, and respectful relationships.
 - Ensuring safe reporting systems are in place and are accessible to all students, including vulnerable groups.
 - Monitoring behaviour patterns and responding proactively to early signs of bullying.
-



18.5 Reporting and Responding to Bullying

If bullying is suspected or reported:

1. All concerns must be taken seriously and reported to the Designated Safeguarding Lead (DSL) or Deputy DSL.
 2. The situation will be investigated thoroughly and promptly.
 3. Appropriate action will be taken in line with our Safeguarding and Child Protection Policy and disciplinary procedures.
 4. Support will be offered to the victim, and action taken to address the behaviour of the perpetrator.
 5. Support and guidance will also be provided to the student(s) whose behaviour caused harm, to help them recognise its impact and prevent reoccurrence.
 6. Parents/guardians and schools will be informed as necessary.
-

18.6 Cyberbullying and Online Risks

Definition

Cyberbullying is bullying that takes place via digital devices such as mobile phones, computers, and tablets, typically through messaging apps, social media, or gaming platforms. It may include sending or sharing abusive messages, spreading rumours, impersonating others, exclusion, or image-based abuse.

Categories of Online Risks (KCSIE 2025)

Content Risks – harmful or inappropriate material children may be exposed to, including:

- Pornographic or violent content
- Extremism, radicalisation, hate speech
- Self-harm or suicide-related material
- Misleading or false information (misinformation/disinformation)

Contact Risks – harmful interactions with others online, including:

- Grooming and online exploitation
- Unwanted contact, harassment, or threats
- Blackmail, coercion, or pressure to engage in harmful activities
- Attempts at radicalisation

Conduct Risks – harmful behaviour by the child themselves, including:

- Sharing nudes or semi-nudes (previously “sexting”)
- Cyberbullying



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- Impersonation or creating fake accounts
- Gambling or risky online challenges
- Excessive use of online platforms leading to dependency

Commerce Risks – commercial exploitation or financial harm, including:

- Online scams or fraud
- Inappropriate in-app purchases or gambling
- Misuse of personal data and privacy breaches

Procedures for Responding to Cyberbullying and Online Risks

- All incidents must be reported immediately to the Designated Safeguarding Lead (DSL).
- Staff must not view, copy, or forward indecent images of children. If a student has shared or received nudes or semi-nudes, the DSL will follow statutory guidance (KCSIE 2025), which may involve contacting parents/carers, children's social care, or the police.
- Where online exploitation, grooming, or blackmail is suspected, the DSL will escalate to appropriate safeguarding partners without delay.
- All incidents will be logged, investigated promptly, and outcomes recorded.

Support for Students

- Students affected will be offered pastoral care, counselling, and practical guidance (e.g. blocking accounts, adjusting privacy settings, online safety skills).
- Parents/carers will be involved where appropriate, unless this would place the student at further risk.

Prevention Methods

- The organisation will provide age-appropriate digital literacy and online safety education to all students.
- Staff will receive regular safeguarding training, including how to identify and respond to cyberbullying and online risks.
- Online safety will be embedded across the curriculum and reinforced through assemblies, workshops, and awareness campaigns.

18.7 Guidance for Students

Speak up: Talk to a trusted adult if you or someone you know is being bullied.



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Don't retaliate: Avoid responding to aggression or offensive messages.

Save evidence: Keep records or screenshots of any incidents.

Use privacy settings: Limit who can contact you online.

Support each other: Be kind and inclusive towards peers.

18.8 Communication and Training

This policy is shared with all staff, homestays, and volunteers. It is available to students and parents upon request. Key elements are included in the Student Handbook and discussed during induction.

18.9 Review and Monitoring

This policy will be reviewed annually or after any significant incident involving bullying. Feedback from students, homestays, and staff will inform updates.

19. Safe Touch & Physical Contact Guidelines

19.1 Purpose

UK Speeder Consulting Ltd recognises that appropriate physical contact can be a valid part of care and support, but it must always be safe, respectful, and in the best interests of the student. These guidelines aim to protect both students and adults from the risk of harm or misunderstanding.

19.2 Principles

- Physical contact should be **in response to the needs of the student**, not the adult.
- Contact should be **age-appropriate** and **public**, never secretive.
- Wherever possible, seek **verbal consent** from the student before initiating contact.
- Avoid physical contact in situations that could be misinterpreted.
- All physical contact must also comply with the organisation's Code of Conduct and Safeguarding and Child Protection Policy.
- Staff and homestays should remain sensitive to cultural differences and individual preferences regarding physical contact.



19.3 Examples of Appropriate Contact

- Comforting a distressed student with a light touch on the arm or shoulder.
 - Providing first aid or medical assistance.
 - Supporting a young child in practical tasks (e.g., fastening a coat) where necessary.
-

19.4 Prohibited Contact

- Any form of sexual contact.
 - Touch that is aggressive, invasive, or unnecessary.
 - Physical intervention/restraint may only be used as a last resort to prevent immediate risk of harm to the student or others, must use the minimum force necessary, and must cease as soon as the risk has passed.
-

19.5 Recording & Reporting

- Any incident involving physical intervention must be reported to the DSL and recorded in the safeguarding log.
 - If a student appears uncomfortable with any contact, it must stop immediately.
 - Records should include the reason for the contact or intervention, who was present, the duration, and the student's response.
-

19.6 Training

Staff, volunteers, and homestays will receive guidance on safe touch during safeguarding training and must adhere to these guidelines at all times.

20. Anti-Radicalisation and Prevent Duty Policy

20.1 Policy Statement

UK Speeder Consulting Ltd is committed to safeguarding all students from the risks of radicalisation and extremism, in line with the UK Government's Prevent Duty Guidance and Keeping Children Safe in Education (KCSIE, 2025).



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We actively promote fundamental British values: democracy, the rule of law, individual liberty, mutual respect, and tolerance of different faiths and beliefs.

This policy should be read in conjunction with our Safeguarding and Child Protection Policy, Online Safety & E-Safeguarding Policy, and Code of Conduct, ensuring a whole-organisation approach to Prevent Duty compliance.

20.2 Scope and Purpose

This policy applies to all staff, volunteers, homestays, students, and partner schools. Its aims are to:

- Raise awareness of radicalisation risks.
 - Provide clear procedures for reporting concerns.
 - Ensure early identification and intervention.
 - Strengthen links with statutory agencies and safeguarding partners.
-

20.3 Responsibilities

- Staff and Homestays: Understand the risks (see in 20.4) and indicators of radicalisation and act promptly on concerns.
 - DSL: Leads on Prevent Duty awareness, ensures training is undertaken, and oversees referrals.
 - Organisation: Works with local safeguarding partners, schools, and statutory agencies to address concerns.
-

20.4 Key Definitions

Radicalisation: The process by which a person comes to support terrorism and/or extremist ideologies associated with terrorist groups.

Extremism: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Terrorism: Actions or threats designed to influence government or intimidate the public, carried out for political, religious, or ideological purposes, involving serious violence, harm, or disruption.

Indicators of Radicalisation (as outlined in KCSIE 2025 and Prevent Duty guidance):

Staff and homestays should remain alert to the following possible warning signs:

- Sudden changes in behaviour, appearance, or peer group
- Expressing extremist views, intolerance, or hatred towards others
- Accessing or sharing extremist material online or on social media
- Secrecy around online activity or new associations



- Isolating themselves from family, friends, or usual activities
 - Increased fixation on political, religious, or ideological issues
 - Using extremist language or slogans
-

20.5. Reporting Concerns

Concerns that a student, staff member, or volunteer is at risk must be reported **immediately** must be reported immediately to the DSL:

- 24-Hour Emergency Contact: 07385335872
- DSL: Ms Xue Yan – alexi.y@ukspeeder.com | +44 7385335872

If the DSL is unavailable or implicated, contact the Deputy DSL or the Local Authority Designated Officer (LADO).

The DSL will assess the concern and, where necessary, make a referral to:

- Children's social care
- Police
- The Channel programme via the local safeguarding partnership

All Prevent-related concerns and actions will be recorded in the safeguarding log and handled in line with statutory guidance and the Data Protection Act 2018.

20.6 Risk Assessment

UK Speeder Consulting Ltd will conduct periodic **risk assessments** to identify students, contexts, or settings that may present a higher risk of radicalisation (e.g., isolation, unsupervised online activity, experiences of discrimination).

Proportionate safeguarding measures will be implemented as required.

20.7 Proportionate Safeguarding Measures

Where concerns about radicalisation are raised, proportionate safeguarding measures will be implemented according to the level of risk. These may include:

- Low-level concern (early signs):
 - The DSL records the concern and monitors the situation.
 - Open and supportive conversation with the student to understand context.
 - Increased pastoral support and guidance for the student and homestay.
 - Liaison with the school DSL (if the student is enrolled in a school).



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- Escalated concern (pattern of behaviours or increased risk):
 - DSL consults with parents/carers where appropriate (unless this would place the student at greater risk).
 - Referral to the Local Authority Prevent Team for advice.
 - Possible referral to the Channel Programme for early intervention.
 - Continued monitoring and support while external advice is sought.
- Serious and immediate risk:
 - Contact the police immediately (999 if there is imminent danger).
 - Inform parents/carers and the school DSL as appropriate.
 - Provide a secure safeguarding record of all actions taken and rationale.

All actions taken will be documented in the safeguarding log, with the outcome and reasons for decisions recorded.

20.8 Training and Awareness

- The DSL and at least one senior staff member will complete accredited **Prevent Duty training**, refreshed annually.
 - Recommended modules: Prevent Awareness, Channel Awareness, Prevent Referrals.
 - Homestays and staff receive **basic awareness training** as part of induction and safeguarding refreshers.
-

20.9 Student Guidance

Students will receive age-appropriate guidance on staying safe from extremist influences, including:

- Understanding respect and tolerance.
 - Safe and responsible online use.
 - Specific risks of **online radicalisation** (e.g., extremist content on social media, gaming platforms, encrypted apps).
 - Encouragement to speak to a **trusted adult** (DSL, Deputy DSL, homestay, or teacher) if worried.
-

20.10 Post-Incident Support

Students affected by radicalisation risks will be offered appropriate support, including signposting to counselling, helplines, and community resources.



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Parents/guardians and schools will be engaged where appropriate to reduce future risk.

20.11 Review and Communication

This policy is reviewed **annually**, or earlier following changes to legislation or a serious incident. It is shared with all staff, students, homestays, parents, and partner schools.

20.12 Resources

- *Prevent Duty Guidance* – GOV.UK
- Free Prevent Training: Prevent E-Learning
- Channel Programme information: via local safeguarding partners

21. Data Protection and Privacy Policy

21.1 Purpose and Scope

This policy outlines how **UK Speeder Consulting Ltd** (“the Company”) collects, uses, shares, and protects personal data in compliance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018**, and the **Information Commissioner’s Office (ICO)** requirements.

This policy applies primarily to **students, parents, agents, schools, homestays, and other external partners** whose personal information is processed by UK Speeder Consulting Ltd in the course of providing guardianship and related services.

It is a public-facing document designed to explain how we handle and protect personal data in connection with our services.

*A separate internal Data Protection Policy for staff and contractors is maintained to cover the company’s internal data-handling procedures and employee responsibilities.

21.2 Data Controller and Registration

UK Speeder Consulting Ltd is registered with the ICO. **ICO Registration Number: ZB774876**

The Company has appointed a **Designated Data Controller** responsible for ensuring compliance with this policy and responding to subject access requests.

21.3 Lawful Bases for Data Processing

We process personal data under the following lawful bases:



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- **Consent** (e.g., photographs used for marketing).
 - **Contractual necessity** (e.g., agreements with parents, students, schools, and homestays).
 - **Legal obligation** (e.g., safeguarding and child protection compliance).
 - **Legitimate interests** (e.g., quality assurance, AEGIS inspections, record-keeping).
-

21.4 Types of Data Collected

We may collect and process:

- Full name, address, and contact details.
 - Student and parent/guardian details.
 - School and academic information.
 - Homestay records (including household members where relevant).
 - Emergency and medical information.
 - Communications, inspection notes, and safeguarding records.
 - Photos and videos (subject to consent).
-

21.5 Information Sharing

Data may be shared, where necessary, with:

- Parents and legal guardians.
- Students.
- Agents and educational consultants.
- Host families.
- Schools and academic institutions.
- Local children's services, safeguarding bodies, or police.
- **AEGIS (including inspectors)**, in line with accreditation requirements.
- Other authorities, where legally required.

All third parties must comply with UK GDPR and sign relevant data-sharing or confidentiality agreements where appropriate.

21.6 Security and Storage of Records

Paper records: kept in locked cabinets.

Digital records: password-protected, encrypted where appropriate, with access controls.

Access: limited to authorised personnel only, reviewed regularly.



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Staff, homestays, and agents are trained and reminded of their responsibilities to maintain data security.

21.7 Consent and Use of Student Photographs

We will only use photographs or videos of students in promotional material (online or print) where:

- Specific, informed **written consent** has been obtained.
 - The purpose of use has been explained clearly.
 - Consent records are securely stored and reviewed annually.
 - Individuals may withdraw consent at any time
-

21.8 Data Subject Rights

Under UK GDPR, individuals have the right to:

- Access their personal data.
- Request rectification or deletion.
- Restrict or object to processing.
- Withdraw consent at any time.
- Complain to the ICO if dissatisfied.

To exercise these rights, contact the Data Controller at: **bruce@ukei.org.uk**

21.9 AEGIS Accreditation Disclosures

As part of our **AEGIS Standard Accreditation**, we may share contact details of stakeholders (staff, homestays, schools, parents) with AEGIS and its appointed inspectors.

This is done under **legitimate interest** and/or **consent**. Where required, explicit consent will be obtained and recorded prior to sharing.

21.10 Retention of Records

Data will only be retained for as long as necessary to fulfil safeguarding, legal, contractual, and accreditation purposes.

Retention schedules are reviewed annually.

Where data is no longer required, it will be securely deleted or destroyed.



21.11 Data Breaches and Complaints

Any suspected **data breach** must be reported immediately to the Data Controller.

Serious breaches may be reported to the ICO within **72 hours**.

Complaints should be directed to the Data Controller, who will investigate and respond promptly.

21.12 Privacy Notices and Transparency

This policy and a **Privacy Notice** will be available in our office, provided at induction to staff and homestays, and shared with students and parents.

Updated versions are available upon request.

21.13. Review of Policy

This policy is reviewed **annually** or sooner if there are changes in legislation, ICO guidance, or safeguarding requirements.

22. Training & Induction Overview

22.1 Commitment to Training

UK Speeder Consulting Ltd will ensure that all staff, volunteers and homestays receive safeguarding training and regular updates that are suitable for their roles. A formal record of all safeguarding training will be securely kept.

DSL and Deputy DSL

- The Designated Safeguarding Lead (DSL) and Deputy DSL will attend suitable face-to-face safeguarding training.
- Where training is completed online, it will be via a live, interactive course.
- This training will be renewed every two years.
- The DSL and Deputy DSL are responsible for remaining up to date with safeguarding legislation and delivering safeguarding updates to staff and homestays.

Other Staff, Volunteers and Homestays

- All other members of staff, volunteers and homestays will receive appropriate safeguarding training to a basic awareness level (previously referred to as Level 1), every three years. This may be completed online or in person.



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- Individuals who have already completed suitable in-date training for another provider will not be required to retrain immediately; however, the DSL must ensure they fully understand UK Speeder Consulting Ltd's safeguarding procedures.

Annual Safeguarding Updates

- All staff, volunteers and homestays will receive regular safeguarding updates at least once per year – normally in September.
- These updates will be delivered by the DSL.

22.2 Induction

- All new staff, volunteers, and homestays receive a safeguarding induction before starting work with students.
- Induction includes:
 - Overview of the Safeguarding & Child Protection Policy
 - Code of Conduct requirements
 - Low-Level Concerns and Whistleblowing procedures
 - Online Safety & E-Safeguarding
 - Procedures for reporting concerns and allegations

22.3 Ongoing Training

- Prevent Duty training will be provided for all relevant staff.
- Safer Recruitment training will be completed by staff involved in recruitment.
- Additional training will be provided in response to emerging risks, policy changes or incidents.

22.4 Record Keeping

- Training records are maintained for all individuals, showing course content, completion date, and renewal dates.
- Records are reviewed regularly to ensure compliance and prompt renewal.
- Training records are available for inspection.

22.5 External Training Sources

We use a combination of in-house briefings, online courses, and external providers, including the Local Safeguarding Partnership (LSP), the UK Government Prevent training portal, CPD Online College, High Speed Training, and the NSPCC Learning platform.

23. Mental Health and Wellbeing Policy

All staff and homestays should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Mental health concerns must always be considered within the



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wider safeguarding context. Changes in a child's emotional state, mood, behaviour, or daily functioning may be a safeguarding signal and must never be dismissed as "normal teenage behaviour" without appropriate assessment.

Risk Assessment and Acceptance of Guardianship

UK Speeder Consulting Ltd will pay due consideration, and a full risk-assessment will be undertaken prior to taking guardianship of a student with mental health issues to ensure that the student's needs can be met. in order to:

- Ensure that the student's needs, including any therapeutic or medication requirements, can be safely and appropriately met by the guardianship organisation, the homestay, and the school.
- Identify any risks to the student or others and implement a management plan with agreed roles and responsibilities.
- Establish communication protocols with parents, schools, and external mental health professionals.

If it is determined that the student's needs cannot safely be met, UK Speeder Consulting Ltd reserves the right to decline or delay guardianship until adequate support arrangements are in place.

Medication Management

Where students require medication for a mental health concern whilst with a homestay. UK Speeder Consulting Ltd will provide homestays with written instructions on a medication form. Homestays should record the dates and times any medication is given on the form provided. This form should be returned to the guardianship office after the student's stay.

Homestays must:

- Store medication securely and in accordance with the instructions.
- Administer the medication only as prescribed.
- Record the exact dates, times, and dosages administered on the official form provided.
- Immediately report any refusal, missed doses, or concerning side effects to the guardianship office.

The completed form must be returned to the guardianship office at the end of the student's stay for secure record keeping in accordance with safeguarding and medical confidentiality requirements.

Identification and Early Support

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Guardianship staff and homestays, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. They are therefore well placed to:

- Notice early signs of distress, anxiety, social withdrawal, self-harm indicators, or significant mood changes.
- Record concerns factually and report them promptly to the Designated Safeguarding Lead (DSL).
- Provide early reassurance and encourage the student to talk, while maintaining boundaries and confidentiality.

Impact of Trauma and Adverse Childhood Experiences (ACEs)



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Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff and homestays are aware of how these children's experiences can impact on their mental health, behaviour, and education.

It is essential that all staff and homestays:

- Adopt a trauma-informed approach.
- Understand that challenging behaviour may be a communication of distress rather than defiance.
- Work collaboratively with the DSL to ensure the student is supported rather than disciplined for trauma-related responses.

External Support and Professional Guidance

Guardianship organisations can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies.

The AEGIS Quality Standards include a Mental Health Support List (Appendix 10), which provides information on local and national mental health services and professional resources. UK Speeder Consulting Ltd refers to this list to ensure that staff and homestays have access to appropriate support contacts and referral pathways.

More information can be found in the [Mental Health and Behaviour in Schools Guidance](#). Guardianship organisations may also wish to follow this guidance as best practice.

Mental Health as a Safeguarding Concern

If staff or homestays have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

Requests from Schools to Remove a Student Due to Mental Health

There may be instances where UK Speeder Consulting Ltd is asked to remove a student with mental health issues from a school setting. UK Speeder Consulting Ltd will work with the student's school to support the student in the best way possible.

In the event of a request to remove a student with a mental health issue from school, UK Speeder Consulting Ltd will ask a member of school staff to complete and return the student removal form (see appendix in the Emergency Procedure) before removing the student from the school. This is to ensure that UK Speeder Consulting Ltd has enough information about the circumstances leading up to the removal of the student in order to support the student suitably, and to ensure all appropriate steps have been taken up to that point.

This policy will be reviewed annually by the DSL and Director, or sooner if significant guidance updates are published

24. Policy Review & Approval

This Safeguarding & Child Protection Policy, together with all associated sub-policies, will be reviewed:



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- Annually, or sooner if there are changes in legislation, guidance, or organisational procedures.
- After any safeguarding incident that highlights the need for policy revision.

The review will be led by the Designated Safeguarding Lead (DSL) in consultation with the Deputy DSL and the Director.

This policy is available to staff, homestays, parents, students, and AEGIS inspectors on request, and is published in our internal portal/handbooks.

Approval:

This policy has been approved by:

Name: Mingyi Zhai

Position: Director **Organisation:** UK Speeder Consulting Ltd

Date Approved: 28 August 2025

Next Review Due: 28 August 2026