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为客户提供高质量，高效率 and
值得信赖的服务是我们永久坚
持的工作目标

SAFEGUARDING AND CHILD PROTECTION POLICY



Summary

This safeguarding and child protection policy demonstrates the commitment by ECA Education Consultancy Limited (hereinafter “ECA”) to provide our utmost care to our students, their parents, our host families and ECA staff. The document summarises current practices in respects of Child Safeguarding & Protection, Safer Recruitment, Missing Student, Whistleblowing, Bullying including Cyberbullying & E-safety Guidelines.

Designated Safeguarding Lead (DSL) Name: (also act as the Prevent Lead)	Mrs. Zheng FU (Christina)
24/7 support Mobile number:	07921 654 766
Landline number:	01274 622390
Email:	christinafu@ecaeducation.com

In the absence of the DSL, or when DSL is unreachable for some reason, or when it would be inappropriate to report to DSL, you can report to our **local council or relevant authority**.

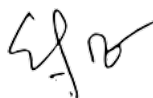
NSPCC Whistleblowing Helpline	Local Council	Leeds Safeguarding Children Partnership	Police
0800 028 0285 (free, 24/7)	www.gov.uk/report-child-abuse-to-local-council	01274 434361	101 999 (Emergency)

This policy will be reviewed annually to reflect the updates of any local or national U.K. regulations and new inputs within our organization (considering all concerned parties' suggestions).

All concerned parties (including but not limited to our students, the parents, our members of staff, host families and partner schools etc.) will be notified immediately, if there are any changes or update to this policy.

This policy is also available on our website (www.ECAeducation.com) together with **Student Handbook, Parent Handbook, Host Family Handbook, Complaints Policy**.

Revised Date: December 2023
Signed off by: Zheng Fu (Christina)



Introduction

ECA Education Consultancy Ltd is a registered business with the Companies House (Company number: 9525524) with a head office set up in Leeds, West Yorkshire, in the North of England.

ECA works with and for the parents and their children as a major part of our business activities. Children's well-being is parents' biggest concern and thus is of paramount importance to us. ECA is committed to safeguarding and promoting the welfare of children and young adults to the greatest extent and expects all the relevant parties (including but not limited to all staff, volunteers, and homestay providers) to share this commitment. ECA is determined to strictly follow government guidance and work closely alongside relevant agencies such as the police and social care organizations. ECA will take effective measures to ensure students' security and happiness both inside and outside their school lives.

ECA uses a children-centred approach to support the safeguarding framework of our business, using what "children have said that they need" in "**Working Together to Safeguard Children (2023)**". We recognise that all staff and anyone connected with us has to work together to ensure that all children and young adults are protected from abuse or any harm and that their well-being is at the centre of everything we do.

- **Vigilance:** to have adults' notice when things are troubling the children
- **Understanding and action:** to understand what is happening; to make sure the children are heard and understood; and to have that understanding acted upon
- **Stability:** to be able to develop an on-going stable relationship of trust with those helping them
- **Respect:** to be treated with the expectation that they are competent rather than not
- **Information and engagement:** to be informed about and involved in procedures, decisions, concerns and plans
- **Explanation:** to be informed of the outcome of assessment and decisions and reasons when their views have not met with a positive response
- **Support:** to be provided with support in their own right as well as a member of their family
- **Advocacy:** to be provided with advocacy to assist them in putting forward their views

Policy Statements

OUR AIMS

We support the international students throughout their study journey in the UK by creating a safe, healthy, and reliable environment and network, so that they can reach their best potential for every stage of their education.

OUR MISSION

We are here to help young international students that choose to study in the UK. From the moment of choosing the right schools, to the moment they finish their A levels, we support them at highest standard possible, so the students have everything they need to ensure a smooth transition in switching school system from their home country to the UK.

OUR VALUES

- **Efficiency:** we listen, we pay attention to details, and we take actions with great efficiency.
- **Consistency:** we make continuous efforts.
- **Achievement:** we strive for excellence and ensure the welfare of the students.
- **Relationships** – Creating and maintaining meaningful relationships among students, families, host families and business partners.
- **Respect** – we promote an environment that appreciates the values of students, families, colleagues and different cultures.

In implementing this safeguarding and child protection policy, we will

- Ensure all staff, host families, volunteers (if any), within our organization understand their safeguarding and child protection responsibilities
- Ensure **24/7 emergency service** is available for our students during their stay in the UK
- Promote the safer recruitment and vetting of staff, host families, volunteers (if any), and anyone who comes into direct contact with our students
- Develop Code of Practice for our staff/host families to follow
- Act appropriately to any allegations, reports or suspicions of abuse. This may involve sharing concerns with agencies who need to know, parents and children appropriately (safeguarding issues include allergies, illnesses such as asthma, mental health, changed behaviour in a student including weight change, bullying, cyber bullying, etc.)
- Comply with current legislation to safeguard children, include Children's Act (2004), guidance in **Working Together to Safeguard Children (2023)** & **Keeping Children Safe in Education (2023)**, guidance from The Leeds Safeguarding Children Partnership ("the LSCP") (<https://www.leedsscp.org.uk/children>) and [West Yorkshire Interagency Procedures](#).
- Ensure the student & host family folders well kept, secure and updated regularly
- keep up to date with the [Safeguarding Contact Database \(Appendix I\)](#) of our partner schools and the relevant safeguarding agencies, which includes the Local Safeguarding Partnership (LSP) – (formerly Local Safeguarding Children Board (LSCB), LADO (Local Authority Designated Officer), social care, MASHs, etc.

Designated Safeguarding Lead

As indicated at the Summary Section, Mrs. Zheng FU (Christina) is nominated as our Designated Safeguarding Lead (DSL).

DSL has overall responsibility for the safeguarding and welfare of our students. She is appropriately trained with Designated Safeguarding Lead Training on 26 & 28 June, conducted by Adam Lubbock Safeguarding Practitioner from King's River Education. Drawing on extensive experience in student affairs, she possesses profound understanding of DSL responsibilities, child protection thresholds, and pathways for support and referrals. Our DSL undergoes biennial training updates to maintain her expertise.

Here are some summaries of DSL's duties and responsibilities:

- To draw up, update and enforcing the company's safeguarding and child protection policy. The safeguarding and child protection policy will be reviewed annually and updated. The most updated version will be available to download on our website (www.ECAeducation.com) to all concerned parties. **If there is any update, DSL will also notify all concerned parties** via email or through other efficient ways of notification, such as wechat messages, etc.
- To provide advice and support to staff (including volunteers if any) and homestay providers who have concerns a child is at risk of, or is suffering from abuse
- To ensure all staff are aware of what they should do and who they should go to if they are concerned a child/young person is subject to abuse or neglect
- to complete a Common Referral form when making referrals to social services when appropriate: Leeds Children's Social Care and send to Leeds Children's Social Care where necessary.
- To ensure the referral is acted upon and issues are addressed in a timely manner
 - Refer persons dismissed/left due to risk or harm to a child to the Disclosure and Barring Service
 - Refer concerns about radicalisation to The Channel Scheme in Leeds District
 - Refer cases where a crime may have been committed to the Police as required.
- To liaise with the **Local Safeguarding Partnership (LSP)** – formerly Local Safeguarding Children Board (LSCB) as necessary and ensure all local inter-agency procedures are followed and documented. Consult LSP for additional information & guidance if needed.
- Continue working with family, sharing information, and contributing to plans if the concern is investigated.
- To arrange Safeguarding basic awareness training for all staff /host families/volunteers (if any) **at least every 3 years** and keep a formal record of all safeguarding training.
- To review safeguarding issues annually with all staff
- To keep detailed, timely, accurate, secure records of concerns, allegations and referrals for any child protection issues.

About Safeguarding

Here is a list of definitions we would like to address at the beginning of this policy:

Safeguarding – is the action that is taken to promote the welfare of children and protect them from harm. It means protecting children from abuse and maltreatment, preventing harm to children's health or development, ensuring children grow up with provision of safe and effective care, taking action to enable all children and young people to have the best outcomes.

Child Protection – is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

Child abuse – Child abuse is any action by another person – adult or child - that causes significant harm to a child, it can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.

ECA recognises that there are many forms of child abuse and ways that a child may be at risk along with common signs and symptoms. The main categories of abuse are as follows:

Domestic abuse: domestic abuse is often difficult to tell because it usually takes place in the family home and abusers can act very differently when other people are around. Children who witness domestic abuse may become aggressive, display anti-social behaviour, suffer from depression or anxiety, not do as well at school due to difficulties at home. Signs of domestic abuse we could watch out for are: withdrawn, suddenly behaves differently, anxious, clingy, depressed, aggressive, problems sleeping, eating disorders, wets the bed, soils clothes, takes risks, misses school, changes in eating habits, obsessive behaviour, nightmares, drugs, alcohol, self-harm, thoughts about suicide.

Sexual abuse: A child is sexually abused when they are forced or persuaded to take part in sexual activities. This doesn't have to be physical contact and it can happen online. There are 2 types of child sexual abuse, contact abuse and non-contact abuse: Contact abuse includes, sexual touching of any part of the body whether the child is wearing clothes or not, rape or penetration by putting an object or body part inside a child's mouth, vagina or anus, forcing or encouraging a child to take part in sexual activity, making a child take their clothes off, touch someone else's genitals or masturbate. Non-contact abuse includes encouraging a child to watch or hear sexual acts, not taking proper measures to prevent a child being exposed to sexual activities by others, meeting a child following sexual grooming with the intent of abusing images,

allowing someone else to make, view or distribute child abuse images, showing pornography to a child, sexually exploiting a child for money, power or status.

Child sexual exploitation is a type of sexual abuse, children can receive something as a result of performing sexual activities or others performing sexual activities on them. It can involve violent, humiliating and degrading sexual assaults, including oral and anal rape, in some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Child sexual exploitation does not always involve physical contact and can happen online.

Violence, coercion, and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Neglect is another form of child abuse. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may put in danger or not protected from physical or emotional harm. They may not get the love, care, and attention they need, a child who is neglected will often suffer from other abuse as well, neglect is dangerous and can cause serious, long-term damage, even death.

Online abuse is any type of abuse that happens on the internet, children and young people may experience cyberbullying, grooming, sexual abuse, sexual exploitation, or emotional abuse. Online abuse is extremely dangerous as it can happen at any time, any place, the abusive images and videos can be stored and shared with other people. A child may be experiencing online abuse if they spend a lot, much more or less time online, texting, gaming or using social media. They might seem withdrawn, upset or outraged after using internet or texting, they might become secretive about who they are talking about, or having lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts. Physical abuse is not necessarily visible, shaking or hitting babies can cause non-accidental head injuries. Sometimes parents or carers will make up or cause the symptoms of illness in their child. There isn't one sign or symptom to look out for that will say a child is being physically abused but if a child often has injuries, or the explanation doesn't match the injury then this should be reported.

Emotional abuse sometimes also called psychological abuse, can seriously damage a child's emotional health and development. Emotional abuse involves deliberately trying to scare or humiliate a child or isolating or ignoring them. Children who suffer from emotional abuse may use language, act in a way or know about things that you wouldn't

expect them to know for their age, struggle to control strong emotions or have extreme outbursts, they seem isolated from their parents or lack social skills or have few, if any, friends.

There are other ways that children or young adults need protection from including:

Bullying is repeated aggressive behaviour that can be physical, verbal, or relational, in-person or online. Bullies are often relentless, bullying repeatedly for long periods of time. The form of bullying can be:

- Physical bullying – includes hitting, kicking, or pushing (or even just threatening to do so), as well as stealing, hiding, or ruining things, and hazing, harassment, or humiliation.
- Verbal bullying – includes name-calling, teasing, taunting, insulting, or otherwise verbally abusing.
- Relationship bullying – includes refusing to talk to you, excluding you from groups or activities, spreading lies or rumours about you, making you do things you don't want to do.

Cyber-bullying occurs when someone uses digital technology, such as the Internet, emails, text messages, or social media, to harass, threaten, or humiliate you. Unlike traditional bullying, cyberbullying does not require face-to-face contact and isn't limited to just a handful of witnesses at a time. It also does not require physical power or strength.

Grooming is when someone builds an emotional connection with a child to gain their trust for the purpose of sexual abuse, sexual exploitation or trafficking. It can happen online or face-to-face, by a stranger or by someone they know-for example a family member, friend or a professional.

Radicalisation and extremism is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo or reject and/or undermine contemporary ideas and expressions of freedom of choice.

Child trafficking is defined as "recruitment, transportation, transfer, harbouring, and/or receipt" of a child for the purpose of slavery, forced labour and exploitation.

Female Genital Mutilation (FGM) is a serious form of child abuse and violence against women and girls, and a violation of human rights. It has been illegal in this country since 1985 and there is a statutory duty to safeguard children and protect and promote the welfare of all women and girls. People guilty of allowing FGM to take place are punished by fines and up to fourteen years in prison.

Recognising the Signs and Symptoms of Abuse

The first step in helping abused children is learning to recognize the signs of child abuse. To gain an awareness of the signs and symptoms of child abuse, all staff, volunteers, and host families will receive **an induction** upon joining ECA. The induction contains the **Working Together to Safeguard Children (2023)** pages 92-94, published by the Department of Education, which provides crucial information on the practical steps and procedures needed to safeguard children effectively. This includes detailed guidance on identifying and responding to potential risks, the importance of timely referrals, and the protocols for maintaining the child's welfare as a priority. Besides we also undertake refresher training as appropriate at least every three years.

The following signs may signal the presence of child abuse.

The Child:

- Shows sudden changes in behaviour or performance
- Has learning problems (or difficulty concentrating) that cannot be attributed to specific physical or psychological causes
- Is always watchful, as though preparing for something bad to happen
- Is overly compliant, passive, or withdrawn

More about signs of Child abuse, here is the website link: www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/

Report Child Abuse: www.gov.uk/report-child-abuse

How to follow up any concerns

“No single professional can have a full picture of a child’s needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action.” (Keeping Children Safe in Education, 2023)

Children who need help and protection deserve high quality and effective support. All the staff/host family have a duty to recognise concerns and maintain an open mind. At ECA, for any concerns of a student’s well-being, the procedures as stated below must be followed:

Stage 1

- continue to talk to the child – it might be difficult to talk to a child who is being abused, by having ongoing conversations and continuous encouragement, the time may come when they are ready to talk.
- be patient, be caring– a child does not feel safe to disclose when they are harmed as most likely they will be threatened, they are too scared, embarrassed or even ashamed and they will have a trust issue with adults. Talk to them with patience and love. Listen to them with positive feedback and tell them that you believe them, and you will try to protect them.
- Keep a diary – This is a good way to keep a note of your concerns and the way a child is behaving; it can also help to spot patterns of behaviour.
- Talk to the child’s teacher or health visitor – The professionals who come into contact with the child may also have noticed them acting differently.
- Get someone else’s perspective – Talk about your worries with a trusted friend or family member or with an NSPCC helpline counsellor. Ask what they think about your concerns.
- Talk through your worries – Report worries to the NSPCC helpline 0808 800 5000 or email help@nspcc.org.uk.

If any students’ welfare concerns should be raised, make sure the Designated Safeguarding Lead is immediately informed. If DSL is not available or inappropriate to report to, report concerns directly to Children’s Social Care, contact details of which is listed in [Safeguarding Contact Database \(Appendix I\)](#).

If it is felt that a child is at immediate risk of significant harm, police shall be contacted on **999**. Call the police on **101**, if you think a crime has been committed.

How to receive a disclosure from a child or young person

It can be awfully hard for children and young people to disclose abuse. Following NSPCC guidance, all the staff working for ECA, including host families and volunteers, will follow the procedure below if a child or young person speaks out about their abuse:

Stage 1:

- **Listen carefully.** Avoid expressing your own view on the matter. A reaction of shock or disbelief could cause the child to “shut down”, retract or stop talking
- **Let them know they have done the right thing.** Reassurance can make a big impact to the child who may have been keeping the abuse secret.
- **Tell them it is not their fault.** Abuse is never the child’s fault and they need to know this.
- **Say you believe them.** A child could keep abuse secret in fear they won’t be believed.
- **Do not talk to the alleged abuser.** Confronting the alleged abuser about what the child’s told you could make the situation a lot worse for the child.
- **Explain what you will do next.** If age appropriate, explain to the child you will need to report the abuse to someone who will be able to help.
- **Do not delay reporting the abuse.** The sooner the abuse is reported after the child discloses the better. Report as soon as possible so details are fresh in your mind and actions can be taken quickly.
- **Notify the DSL** of the disclosure immediately or contact Initial Contact Point and/or the police if DSL is not available and you believe the child or young person to be in immediate danger.

Parental Consultation

ECA should seek, in general, to discuss concerns with the family and, where possible seek the family’s agreement to making a referral unless this may, either delay the referral or place the child at increased likelihood of suffering significant harm.

A decision by any professional not to seek parental permission before making a referral to Children’s Social Care Services must approved by DSL who is also our **company director - Zheng Fu (Christina)**, recorded and the reasons given. Where a parent has agreed a referral, this must be recorded and confirmed on the relevant referral form.

Where the parent is consulted and refuses to give permission for the referral, further advice and approval should be sought from DSL or Named Professional, unless to do so would cause undue delay. The outcome of the consultation and any further advice should be fully recorded.

If, having taken full account of the parent’s wishes, it is still considered that there is a need for a referral:

- The reason for proceeding without parental agreement must be recorded;
- The Children’s Social Care Services team should be told that the parent has withheld permission;

- The parent should be contacted by the referring professional to inform her/him that after considering their wishes, a referral has been made.

Stage 2:

The DSL will take immediate action if there is a suspicion a child has been abused or likely to be abused and will contact:

- Leeds Children's Social Care Initial Contact Point Mon – **0113 376 0336** (Monday, Tuesday, Thursday, 9am to 5pm; Wednesday 10:30am to 5pm; Friday 9am to 4:30pm).
- For advice and referrals. If a referral is made by telephone, this must be followed up in writing immediately, using the Common Referral Form
- At all other times contact the Emergency Duty Team on **0113 535 0600**
- For all general enquiries contact Children's Specialist Services on **0113 222 4403**

Advice and support can also be sought through:

Childline on **0800 1111**. Calls are free and confidential.

NSPCC 24-hour National Child Protection Helpline on **0808 800 5000** or help@nspcc.org.uk

How to respond to an allegation against staff/host families

Our DSL is responsible for coordinating the responses to any allegations within ECA. ECA will ensure any allegations made against staff or host families will be dealt with swiftly and in accordance with the following procedures:

Initial Actions by person receiving or identifying an allegation

The person to whom an allegation is first reported should treat the matter extremely seriously and swiftly and keep an open mind.

They **should**:

- Listen to the child carefully and accept what they are telling you.
- Ensure the child is safe and away from the person against whom the allegation is made
- Make a written record of the information (where possible in the reporter's own words), including the time, date and place of incident(s), persons present and what was said;
- Sign and date the written record;
- Immediately report to the DSL, or if the DSL is in his absence or; where the DSL is the subject of the allegation report to **local children social care authority**.

They **should NOT**:

- Investigate or ask leading questions if seeking clarification;
- Make assumptions or offer alternative explanations;
- Promise confidentiality but give assurance that the information will only be shared on a "need to know" basis.

Action by the DSL

When informed of an allegation, the DSL should not Investigate or interview the staff or host family against whom an allegation has been made or potential witnesses

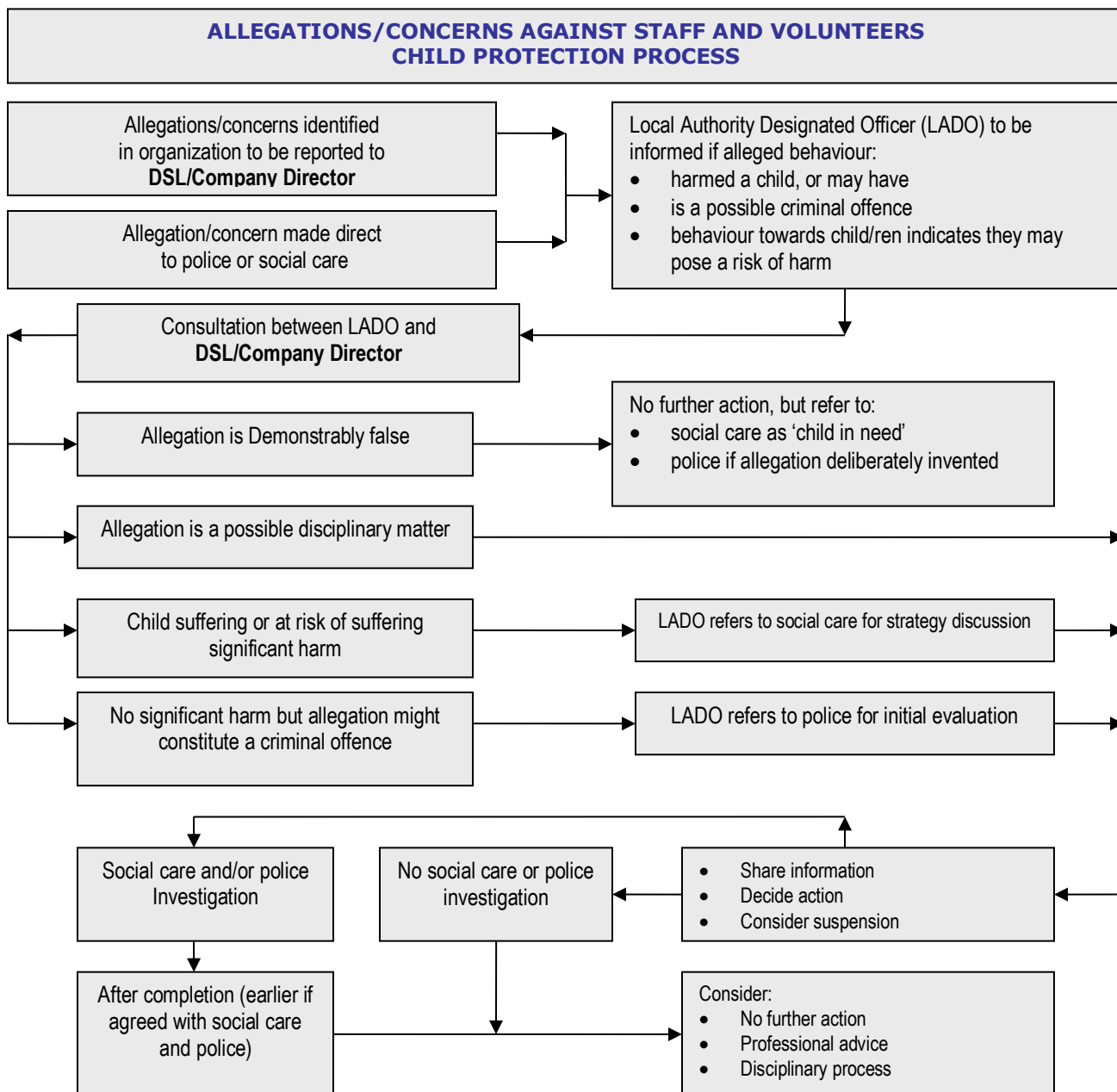
DSL **should**:

- Obtain written details of the allegation, signed and dated
- Approve and date the written details
- Record information about time/date/location of incident(s)/potential witnesses

Notify the relevant officer within Local Area Designated Officer (**LADO**). The LADO shall be informed of all allegation against adults working with children and provides advice and guidance to DSL on the progress of cases to ensure the allegations are resolved as quickly as possible. The **Safeguarding Children Partnership & LADO** details please see **our Short Contacts List for Safeguarding Purposes** at the end of our policy.

- Under no circumstances at this stage should information about the allegations be given to a person who is implicated or against whom an allegation has been made. ECA should seek advice from the LADO, the Police and/or Children's Social Care Services as appropriate about how much information should be disclosed to the accused person.
- ECA has a legal duty under the Safeguarding Vulnerable Groups Act (SVGA) 2006 to make a referral to the DBS in cases when an employer has dismissed or removed a person from working with children or vulnerable adults (or would or may have done so

if the person had not left or resigned) because of concerns over their behaviour towards children. For more information, see [NSPCC factsheet](#) and [DBS Guidance](#).



How to keep records & manage confidential information

It is important when safeguarding records to note exactly what was said as soon as possible when any concern/disclosure/allegation/referral is raised. It is the responsibility of the DSL to keep detailed, accurate, secure written records.

Well-kept safeguarding records will assist and support DSL in meeting the key responsibilities to respond appropriately to safeguarding concerns and to keep the communities safer. Effective record keeping will also support monitoring, risk-assessment and planning for learners, and will enable informed and timely referrals to be made when necessary.

Members of staff should make a written account of any concern they have regarding the welfare or wellbeing of a child. This record should be passed as soon as possible to the DSL.

Once a safeguarding concern has been passed to the DSL and a record has been made of the action taken and/or decision making, these documents will be filed in a safeguarding filing system managed by DSL and stored in a locked cabinet in the ECA office. Safeguarding records will be stored for five years and afterwards will be transferred into an encrypted electronic folder which will be stored till the relevant child's 25th birthday. Following this, the file should be shredded.

Safeguarding records are appropriately maintained in line with:

- **General Data Protection Regulations (GDPR)**
- [Data Protection Act 2018](#)
- The Information Commissioner (ICO and General Data Protection Regulators) has produced a useful publication [Preparing for the General Data Protection Regulation \(GDPR\) - 12 steps to take now](#)

All records of safeguarding concerns, disclosures or allegations are to be treated as sensitive information and will be kept together securely (separate file for each child). Those safeguarding records are separately filed from the child's general guardianship records.

The information should be shared with all those who need to have it to enable them to carry out appropriate duties to safeguard children, but it should not be shared wider than that.

Keeping Children Safe in Education (September 2020) identifies that "All concerns, discussions and decisions made, and the reason for those decisions, should be recorded in writing".

Therefore, the **Record Pro Forma (Appendix III)** should include:

- A record of the student's details: name, gender, date of birth, address, and family details
- Date and time of the event / concern
- The nature of the concern raised
- Record of communications, discussions, telephone calls and meetings (with colleagues or services, parents and children)
- The action taken and by whom

And in case of disclosure, the record should also include:

- As full an account as possible of what the child said
- An account of the questions put to the child
- Time and place of disclosure
- The demeanour of the child, where the child was taken and where returned to at the end of disclosure

Here is a guidance when making a record of a child protection incident or concern

All notes and reports must include following:

- Date of the incident
- Date and time of the record being made
- Name and date of birth of the child(ren) concerned
- A factual account of what happened and the location where the incident took place (include the actual words spoken by the child where possible)
- A note of any other people involved e.g. witnesses
- Action taken and future plans e.g., monitor and review
- Any other parties informed
- Printed name of the person making the record
- Job title of the person making the record
- Signature

How to ensure smooth homestay accommodation experience

Please read this content in conjunction with our **Host Family Handbook**.

All host families are visited and assessed with an **Homestay Inspection Checklist (Appendix IV)** before they are able to accept any student, revisits and regular safeguarding updates will take place annually and further monitoring takes place by checking student evaluations where any concerns may be addressed by an interim visit. The appropriate Enhanced DBS checks with Barred List Checks are made across our host family database.

Host families are provided with a **Host Family Handbook** on hosting overseas students. Some key points which help to safeguard the welfare and privacy of students for homestay providers to follow:

- Ensure sufficient privacy for our student (e.g.: enter the student's bedroom appropriately by knocking first)
- Ensure security (e.g. bathroom and bedroom doors shall be able to be locked from the inside)
- Create a healthy environment (e.g. smoking is not allowed inside the house for host families, their visitors)
- Restrictions on tobacco/alcohol/illegal drugs with details in our Student Handbook and Student Code of Conduct, if Host Family suspects the student has relevant issue(s), please remind them of the English laws (they will already have been informed by ECA about the restrictions but please still contact us, we will take appropriate action).
- Host Family House rules to be communicated in advance (e.g. bedtime, mealtime, other routines, etc.)

It is also the Host Family's responsibility to make sure all electrical appliances are safe and we recommend PAT testing each electrical appliance annually. All gas appliances are to be inspected annually by a Gas Safe registered plumber, and a Gas Safety Certificate provided to ECA. Smoke and Carbon Monoxide alarms MUST be fitted in the house. Medicines and/or chemicals must not be stored accessible to the students. Explain basic fire escape routes, access to the outside doors, and the location of any necessary keys. Please also ensure that they know to dial 999 for Police, Fire or Ambulance should any such emergency arise.

If a CCTV system is installed in the household, Host Family must comply with the Surveillance Camera Code of Practice (the SC Code) and its 12 guiding principles, which if followed will ensure that surveillance camera systems are operated proportionately, transparently and effectively. Host Family must make sure that the recording is not used for any other purpose than protecting the property. Upon students' arrival, Host Family must inform the students that the CCTV system is in operation and explain the positions the CCTV camera devices cover.

There are occasions where our student is alone with an adult, which is likely to happen in the household. Under normal circumstances there should not be any physical contact with students (e.g. a hand on the shoulder). In case that the student is distressed or hurt in an accident, a brief hug to comfort or first-aid assistance is reasonably acceptable.

How to work with parents and partner schools

ECA Education Consultancy Limited recognises a child's welfare as a paramount responsibility, however, good child protection practice and outcomes relies on a positive, open and honest working partnership with parents and our partner schools.

When schools and parents work together effectively, children have a far better chance of not only being successful in school but also successful in life. We act like a communication bridge between our students' parents and their schools.

We have prepared a **Parent Handbook** to guide the parents through their children's coming to the UK to study. A handbook cannot anticipate all the questions that a parent might have, we are here to answer your other questions.

ECA believes the CRR to effective partnerships between parents and partner schools, which is communication, respect, and responsibility.

Communication: healthy communication enables transfer of information from one to another. ECA will talk openly and be good listeners between parents and schools. We will act as early as we can rather than delay or wait till the last minute.

Respect: both the parents and the schools are valued, trusted, and respected. The needs of the child come first, and the child's needs and welfare form the basis of all interactions.

Responsibility: No one shall blame the other for what is not working but instead claim responsibility for the child's success. There is the underlying belief that all parties want what is best for that child. If all want the same thing, then all are willing to share responsibility for the success of the child.

Whilst we may, on occasion, need to make referrals without consultation with parents or partner schools. We will make every effort to maintain a positive working relationship with them whilst fulfilling our duties to protect any child.

How to promote safer recruitment and regular training

ECA recognises that one of the keys of safeguarding children from harm is to conduct strict recruitment procedures.

Our company director Christina has completed a fully accredited online training course of safer recruitment in education provided by NSPCC. Christina has been and will always be involved in the face-to-face recruitment interviews. Following the statutory guidance of **Keeping Children Safe in Education (2023)**, all the staff, volunteers, homestay providers will be carefully interviewed, selected, screened, trained, and supervised.

While recruiting, ECA will:

- Ensure all applicants share our mission, values and aims
- Carry out an Enhanced DBS with Barred list checks for staff, volunteers, homestay providers over 16 years old who have contact with students
- Ensure all applicants have read and signed [Suitability Declaration Form \(Appendix V\)](#)
- Ensure all staff complete Child Protection Basic Awareness Training and refresh at least every 3 years
- Confirm identity to establish that applicants are who they claim to be (through official documents) and have the Right to Work in the UK
- Ensure that references are checked and that any gaps in previous employment history are accounted for

If a DBS check is still being processed at the commencement of employment ECA will restrict the responsibilities/ duties that a member of staff may undertake.

Applications

All staff and homestay providers will be required to complete an application form which contains their personal information. ECA will also require each applicant's consent to undertake an Enhanced DBS check.

On the application form basic details will be required and a minimum of two references must be obtained which should include one professional and one personal. These referees should be able to provide insight and a further data point as to the appropriateness of the individual for the role and to be working with children. All referees will be contacted directly by ECA. **Any general reference will not be accepted.** Where a telephone reference is obtained then a record of that conversation, with whom, date/time, and content of the reference will be logged on the ECA reference form.

Recruitment Process

The recruitment process is split into two sections:

1. Staff recruitment
2. Host Family recruitment

ECA uses **Single Central Record** to store staff/Host Family interview information. All the detailed notes of staff and Host Family interviews are stored by the **company director-Mrs. Zheng Fu (Christina)** electronically.

Staff recruitment

Upon reading through the applicants' resumes received, the recruitment team (at this stage, the recruitment team consists of our Director and DSL) will select some of applicants who are more suitable candidates simply based on the resume content. ECA will conduct an initial telephone interview to have a better judgement of the suitability and motivation of the applicants. ECA will explain the whole recruitment process and the requirement for enhanced DBS checks. Applicants, prior to a face-to-face interview, should be also reminded of the identity documents they shall present at the scheduled interview.

The face-to-face interviews will be conducted by the company director directly and shall assess the applicants' suitability and explore their motivation for work with children and young people and their understanding of safeguarding and their ability to support the safeguarding and child protection policy and to promote the welfare of children and young adults.

All applicants shall be assessed equally according to the criteria specified in the job description. Probation period will be arranged to further evaluate the applicant's capability. Applicants will not be offered any work around children and young people until ECA receives a valid enhanced DBS, all other checks are complete, and their probation period is passed.

Host Family recruitment

Recruitment of the host families must also strictly follow safer recruitment procedures. Advertisements will stress the responsibility for safeguarding and promoting the well-being of children and that applicants are required to complete an enhanced DBS check.

If any homestay candidate families reach ECA showing interest in hosting our international students, ECA will have a telephone discussion with them. Following the telephone discussion, ECA will send the applicants by email our company website mentioning all the downloadable policies, a Host Family Handbook, Homestay Information Form, and Letter of Consent to provide enhanced DBS checks for all adults and children over the age of 16 who live in the household. The Host Family Handbook is to help the applicants' understanding of their responsibilities of hosting international students and their full awareness of Safeguarding and Child Protection Policy. The Homestay Information Form and Letter of Consent must be completed, signed by applicants and returned to ECA. On the Homestay Information Form completed by the applicants, there will be two references named for ECA to contact and further verify the applicants' suitability to host students.

Upon receiving the signed Homestay Information Form, Letter of Consent, and verification with the two references provided, ECA will make an appointment with the applicant for a home-visit. ECA will inform the homestay applicant to provide the following on the actual home-visit date:

1. Provide the required valid enhanced DBS check certificates if available.

2. Provide all relevant documentation for conducting enhanced DBS checks, e.g. passport, driving licence, original birth certificate, bank statement, council tax statement
3. ECA will be required to take pictures of the home and the home environment.
4. Ensure the smoke and carbon monoxide detectors are fitted (minimum of one smoke detector per storey and one carbon monoxide detector in any room containing gas, liquid or solid fuel burning appliances)
5. A copy of gas safety certificate (an annual gas safety check to be undertaken by a Gas Safe registered engineer) if applicable
6. Electrical system is tested (the electrical system is safe, e.g., sockets and light fittings are secure and not overloaded and any appliances used by students are safe)
7. Evacuation routes
8. Fire extinguishers and fire blankets are suitably serviced if the property have them installed due to its classification as a house in multiple occupation.
9. Basic first aid kit including but not limited to plasters, sterile eye-pad, triangular bandage, safety pins, non-medicated wound dressing, disposable gloves, guidance leaflet)
10. Provide access to car and household insurance policies.

During the home-visit, ECA will view the home courteously. ECA will pay more attention to the kitchen, bathroom, student bedroom and take pictures with host family's permission. If there's a car to be used to transport the student, it is looked at carefully where possible. During the visit, all original documentation must be seen, and copies / photos taken for further reference.

All questions and answers shall be recorded and filed along with all the pictures and documentary evidence. If what the ECA assessor sees or hears is inconsistent with information the homestay has previously said or declared in Homestay Information Form, these matters will be raised with the homestay politely and notes made of the inconsistencies and homestay's explanations.

As agreed in the Homestay Agreement, Homestay will allow ECA inspection visits at any time given suitable notice and will co-operate with inspection visits. ECA will ensure regular monitoring (**at least once every year**) and necessary communication with the host families.

Copies of the ECA Safeguarding and Child Protection Policies and Host Family Handbook will be made available to the homestay.

Staff/Host family induction

New staff/host family will receive an induction training, which will give an overview of the organization, ECA's mission statement, values, aims, the company structure, services provided, some safeguarding knowledge. Through the training, they will have a better understanding about their role together with understanding any safeguarding and child protection matters, and confidentiality issues.

All staff and our contractual host family will receive regular Safeguarding Awareness Training with updates to allow them to fulfil their responsibilities in respect of child protection effectively. The above-mentioned training will be arranged mostly by the DSL (occasionally through third party such as AEGIS), and it will be conducted at least every three years.

All homestays should receive regular safeguarding policy updates, at least once per year- normally in December every year.

Student Welfare Induction

Prior to the students' arrival in the UK, ECA will make sure they receive a welfare induction where they receive the appropriate information, including but not limited to:

- The name and contact details of the DSL and other useful contacts
- Who to consult with if they have a problem with classes, accommodation or personal matters.
- The legalities relating to buying alcohol, visiting pubs, taking drugs, etc.
- Tips to settle.
- Dos and Don'ts

External safeguarding training

Considering there are often changes in legislation or expectations, DSL will receive training every two years. To properly understand local procedures, thresholds and risks, DSL will attend the local safeguarding partnership training given the opportunity.

In order to fully understand its changing role, DSL will seek other safeguarding training opportunities from AEGIS or any other accredited third party, through which DSL will refresh his knowledge, skills, and understanding of relevant safeguarding issues on a regular basis.

Whistleblowing Statement

According to the guidance of <https://www.gov.uk/whistleblowing>, **whistle-blower** is a worker who discloses information on a person or organization regarded as engaging in some types of wrongdoing. As a whistle-blower, you are protected by law—whistle-blower should NOT be treated unfairly or lose job because of whistleblowing.

Complaints that count as whistleblowing. You are protected by law if you report:

- a criminal offence, for example fraud
- someone's health and safety are in danger
- risk or actual damage to the environment
- a miscarriage of justice
- the company is breaking the law, for example does not have the right insurance.
- you believe someone is covering up wrongdoing.

This statement applies to all staff (including volunteers, temporary staff), homestays, because every one of them are the foundations to realize the well-being of our students. As a business, we will make every effort to create an open, transparent, and safe working environment where ECA members feel free to speak up.

We value anyone who could spot any wrongdoing, suspected misconduct, illegal acts of our organisation that could potentially cause damage to the business and public interest. We encourage them to come forward and voice their concerns. By doing that, ECA will have a chance to improve or amend.

Within ECA, a whistle-blower's report is to be submitted in writing to our DSL:

Zheng FU (Christina)

christinafu@ecaeducation.com

16 Grosvenor Mews, Rawdon, Leeds, LS19 6SD UK

Whistle-blower is required to provide a full description of the report, include copies of any supporting evidence. Please also provide your email or postal address so we can reply. A response to the report will be arranged within 10 working days. If the response is deemed as inadequate, it is encouraged to seek further advice from external body.

If the report is regarding a senior staff, an external body can be contacted, such as:

- NSPCC Whistleblowing Helpline (0800 028 0285 8:00-20:00 Monday to Friday or email: help@nspcc.org.uk) where concerns relate to child protection failures; or
- PROTECT provide a free, confidential advice line for concerned staff to call. The helpline is 020 3117 2520 and the website is: www.pcaw.co.uk; or
- AEGIS (Tel: +44 (0) 1453 821293, info@aegisuk.net).

We are not in the right position to deal with any official complains regarding independent schools or their faculty – please follow the relevant procedures applicable.

Information Sharing Policy

Sharing Information early is the key to provide effective [early help](#) and early intervention where there are emerging problems. Information sharing is essential for effective safeguarding and promoting the well-being of children and young people. As revealed in many Serious Case Reviews (SCRs), poor information sharing has resulted in missed opportunities to take actions that keeps children and young people safe.

As safeguarding frontline practitioners, ECA Education Consultancy Limited and our staff will ensure all Children's information will be treated respectfully and confidentiality, however, the information will be shared if any child is at risk or suffering significant harm, guidelines from **Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers** July 2018, **General Data Protection Regulation (GDPR)** and **Data Protection Act 2018**.

As a general principle, we would ask for consent from the child/parent/carer before sharing the information unless asking for a consent may increase the risk of significant harm, or a delay in sharing information may increase the risk of harm to the child.

When contacting any Early Help or Early Intervention services in relation to children with additional needs, this must always be done with consent of them / their family.

We will keep a record of our decisions and the reasons for it – whether it is to share information or not. If we do decide to share, we will record the exact information we have shared, with whom and for what purpose we have share that information.

Missing Student Policy

ECA's students are provided with a 24/7 emergency mobile number to contact to assist them whenever needed. Students are also made aware of how to get advice and support from NSPCC, ChildLine, and Police.

ECA developed this policy with the guidance in Children Missing from Education. In the event of a missing student, schools have the lead on any such incidents during the school term. ECA respond to incidents during students' out-of-school periods, such as EXEAT weekends, half terms, long holidays, etc.

It should be noted that a missing child could potentially be at risk of abuse or neglect. We are alert to that possibility and will notify all relevant authorities if it is deemed necessary.

Once a student is reported missing from school/homestay family/ travel provider, we shall follow the following procedure:

- 1) staff alert the DSL;
- 2) DSL will take responsibility of all the communications and take immediate action and calmly make necessary searches among possible locations if applicable.
- 3) If there is no sign of the child in reasonable search time, DSL will communication with parents/school/homestay family/appropriate services and call the police.
- 4) ECA will then wait for the police to arrive and follow their instructions.
- 5) ECA would continue to carry out searches, such as contacting the student's friends/classmates for clues whilst awaiting the police.

If anyone has concerns that a child or young people in his/her care has gone missing, the carer should consider the following:

- This child is at immediate risk of facing harm – call 999 and engage the Police
- This child may be at risk of facing harm – call 111 and discuss with local Police
- The child is not at immediate risk of harm but you are concerned – call DSL

At all times staff and homestays must contact the DSL and inform us of any concerns on 07921 654766/ 07712 165221. If a student who is booked with a homestay has not turned up within 5 minutes as he/she is expected and there is no explanation or communication for such delay, it's the host family's duty to report this issue to DSL and DSL will follow up to locate this student.

DSL will record details of:

- The date and time of the missing incident.
- Where the child was
- When the child was last seen
- What happened before the child went missing
- Conclusion

Bullying including cyberbullying guidelines

Bullying is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening, undermining, controlling, or manipulating someone. It happens everywhere – at school, at home or even online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

Cyberbullying is the above bullying that happens online, rather in the real world. Cyberbullying can follow the child wherever they go, via social networks, gaming and mobile phones. Cyberbullying can be unlawful and a criminal offence and as such may have to be reported to the police.

The forms of cyberbullying can include:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- excluding children from online games, activities, or friendship groups
- setting up hate sites or groups over a particular child
- encouraging young people to self-harm
- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name

There are possible signs that a child might be bullied, carers need to watch out for: physical injuries, being nervous, losing confidence, etc.

When any member of ECA, volunteers, homestay families suspect any sign of a child being bullied in any form, here are the tips to follow:

1. Report to or seek advice from DSL
2. Talk to the child about bullying and cyberbullying: the child might be scared, embarrassed or ashamed. They might be worried about what will happen if the bullying is disclosed. Choose a more relaxed time to bring this up, they might open up
3. Let them know who to ask for help: if the child being bullied is not willing to open up, we may suggest the child to chat with another trusted adult, such as a teacher or a respected person or even contact Childline where a trained counsellor will provide a listening ear. Tell the child there is no need to give their name to the Childline service.
4. Help them to relax and take time out: in the event of child losing confidence as a result of bullying, reassure them it's not their fault and they are much loved and valued. If the child is emotional, distract the child with entertainment such as music, games, sports, etc. to rebuild their confidence.
5. Report bullying on social media and online gaming sites. Report anyone who is bullying a child to the platform that's carried the offending comments, audio, image, or video. Thinkuknow (www.thinkuknow) has advice on online safety for children and young people that's suitable for different age groups.
6. Report bullying videos shared online: get in contact with the site the video's been shared as soon as possible. Social networks are most likely to take the video down if the child involved in the video or a guardian makes the report.

7. Talk to the Child's school or club. All schools have a responsibility to protect their students from bullying. Tell school the effect the bullying is having on the child and make it clear that a response is expected in a short time.

If there is any worrying sign that something is bothering the child and they will not tell, let the child know Childline can help. Childline offers a confidential counselling service to under 19's a safe space to talk, 24/7 at www.childline.org.uk or by phoning free on 0800-1111.

On the other hand, if a child is found bullying others, we shall explain to them what is bullying and help them understand it is not acceptable and bullying will hurt people.

E-safety guidelines

Mobile phones, tablets, computers, and internet are becoming a more and more important part of students' lives. It helps with the education, making the social life easier and more efficient, but students should be guided to protect themselves from any harm from the internet, not to overuse or misuse these intelligent appliances.

Areas of risks of E-safety

E-safety can be categorized into three areas of risk:

- Content: being exposed to illegal, inappropriate, or harmful material, for example, web pages, indecent images of children or pro-eating disorder or self-harm websites etc.
- Contact: being subjected to harmful online interaction with other users, for example cyberbullying or grooming; and
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm.

Staff and Host Families

ECA will liaise with host families to reassure that students are advised on safe use of the internet and mobile devices. We have advised staff in the **Staff Code of Conduct** and host families in our **Host Family Handbook** on 1) how to keep an eye on the students using internet and mobile devices; and 2) how to advise our students keep from potential online risks. Homestay families play a crucial role in ensuring that the students who stay with them use the internet and mobile devices align with the guidance contained in this policy.

Students

Secondly, we have also advised students how to access internet safely in the **Student Handbook**. Students must know the importance of adopting good E-safety practice and reporting misuse, abuse or access to inappropriate materials and know how to report these concerns. ECA offers further support to students through our regular conversations in raising their awareness of how to stay safe online by sharing some stories or cases.

Students are not allowed to use the internet for any illegal activity, this includes accessing sites meant for adults or 18 years or older such as pornographic or gambling sites. Students must not search for, or browse through, any sites that contain offensive, obscene, violent, dangerous, inflammatory, racist, or extremist material. Downloading any unlicensed material such as music, video, TV programmes, games and PDF files is illegal and therefore not permitted.

Possible signs of online abuse:

Possible signs of a child experiencing online abuse (listed by NSPCC) if they demonstrate a change in behaviour or unusual behaviour:

- Being upset after using the internet or their mobile phone.
- Unwilling to talk or secretive about their online activities and mobile phone use;
- Spending much more or much less time texting, gaming or using social media;

- Many new phone numbers, texts or e-mail addresses show up on their mobile phone, laptop or tablet;
- After texting or being online they may seem withdrawn, upset or outraged;
- Not wanting to go to school and/or avoiding meeting friends and school mates;
- Avoiding formerly enjoyable social situations;
- Difficulty sleeping;
- Low self-esteem.

Measurements to set boundaries

ECA encourages staff and our host families to set an appropriate agreement with students in order to supervise internet access and set boundaries about what they can and cannot do online. If a child breaks the rules, we would ask the host family to restrict internet access for an agreed period of time. For the parents and carers (including our host families) who experience any internet safety issues with their children, O2 and NSPCC have set up a helpline: 0808 800 5002.

Some of the suggested advice how to talk to children about online safety:

www.thinkuknow.co.uk/parents/articles/having-a-conversation-with-your-child
www.nspcc.org.uk/keeping-children-safe/online-safety/talking-child-online-safety/

The NSPCC website 'Online Safety' outlines controls that homestays can implement to filter and monitor what a child in their house can see, including checking that parents know how to use privacy settings and reporting tools:

www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/

It's hard to navigate online risks as a parent or carer. The NSPCC provide advice for homestays on parental controls which allow a number of different things to happen including filtering and blocking content, setting different profiles so that each family member can access age appropriate content and restricting information that can be shared:

www.nspcc.org.uk/preventing-abuse/keeping-children-safe/online-safety/parental-controls/

Childnet have summarized good tips for the issue of coming across "nude pictures" online:

www.childnet.com/help-and-advice/nudes-11-18-year-olds/

Internet matters – helping parents keep their children safe online:

www.internetmatters.org/

How social media is used to encourage travel to Syria and Iraq: A briefing note

www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation

Our DSL take the lead with any E-safety issues and will deal with any concerns raised.

Procedure for dealing with an incident which involves online services:

1. ECA staff member receives the report of suspected online abuse from a student, parent or other source by face-to-face disclosure, email, messages, or telephone call.
2. ECA Staff member adheres to this **Safeguarding and Child Protection Policy** including contemporaneously recording the disclosure in the most appropriate format (using the 'Tell Explain Describe' model if the information is being given by a student).
3. The record of the disclosure is reported verbally as soon as practicable to our DSL. The staff member must submit a written record of the disclosure to DSL.
4. The DSL will hold an emergency strategy meeting to discuss the incident, assess the alleged threat and risk to the young person (including any relevant facts about the child which may affect their vulnerability including age and ability), implement an action plan and continue to review the situation until a resolution has been achieved.
5. The meeting will be recorded with timed and dated entries within an incident record to record all actions and updates.
6. Our DSL will arrange for the young person to be helped and supported in recognition of the pressures (and possible vulnerabilities) they may have been under as a result of the suspected abuse. This could include helping them to understand how to recognise the early signs of online abuse, the wider issues and motivations of online abuse and making available relevant information and material. This help and support could be provided from accredited organisations such as the school, NSPCC, ChildLine and National Crime Agency (NCA) – Child Exploitation and Online Protection Centre (CEOP) websites and helplines.
7. The DSL will ensure that viewing of the images or other content is only made where there are good and clear reasons to do so (unless unavoidable because the student has willingly shown a member of staff), basing incident decisions on what the DSL has been told about the content of the imagery or other content. Our DSL will ensure that staff members do not search through devices and delete imagery unless there is a good and clear reason to do so.
8. DSL will consider the need to ask for the student to produce the device as evidence. The viewing of any images, other content or seizing of any devices will be recorded.
9. DSL will consider the need to contact school, college, setting or individual and whether to contact the parents or carers of the children involved. In most cases parents should be involved unless there is good reason to believe that involving these parties would put the young person at risk of harm.
10. The incident will be referred to a statutory agency (Children's Services on the Local Authority telephone number or the police by dialling 101) immediately if there is a concern a young person has been harmed or is at immediate risk of harm (telephone the police by dialling 999). This would include information coming to light if at the initial stage:
 - The incident involves an adult
 - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
 - What you know about the imagery or other content suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
 - The imagery or content involves sexual acts and any pupil in the imagery is under 13

- You have reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming. Where the material or activities found or suspected are illegal and there is no immediate risk to the child, The Child and Exploitation Online Paedophile Unit should be informed. If none of the above apply, the DSL may decide (with input from key stakeholders if appropriate) to respond to the incident without involving the police or children's social care. The DSL can choose to escalate the incident at any time if further information/concerns come to light. The decision should be recorded in line with the Safeguarding Policy and Child Protection Policy, and regularly reviewed throughout the process of responding to the incident.

The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved, and the risks can be managed within ECA support framework and network for the child.

12. DSL will advise to the young person to delete imagery or other content, and to confirm they have deleted the imagery. Young people should be given a deadline for deletion across all devices, online storage or social media sites on the basis that possession of youth produced sexual imagery is illegal. Where a young person refuses or is later discovered to have not deleted the images or other content, they are committing a criminal offence, and the police may become involved. A record will be made of these decisions including decisions, times, dates and reasons.

13. Where the DSL is aware that youth produced sexual imagery or other content has been unavoidably viewed by a member of staff, the DSL should ensure that the staff member has appropriate support. Viewing youth produced sexual imagery or other content can be distressing for both young people and adults and appropriate emotional support may be required.

14. Where police action has been instigated for an incident involving a member of staff or volunteer, ECA internal procedures will take place at the conclusion of the police action. A suspension will be likely to take place before the internal procedures begin.

ECA is committed to reviewing this policy and good practice annually.

Students code of conduct

All our overseas students are provided with a **Student Handbook** together with **Student Code of Conduct (Appendix VI)** before their arrival in the U.K. ECA coordinator will go through the **Student Handbook** and **Code of Conduct** to make sure the students have a good understanding about them. The students will also receive a welfare induction which is stated in the Safeguarding and Child Protection Policy.

Staff code of conduct

ECA is committed to providing effective and caring services to promote the welfare of our students. To ensure the effective operation of our business, all members of our staff share this commitment and are expected to demonstrate the highest standards of behaviour. Please see our **Staff Code of Conduct (appendix VII)**

Statement on Private Fostering

A **Private Fostering** arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

The local council where the Private Fostering arrangement happens has a duty to make sure the child is safe and ensure that the carer(s) get the support and advice they need whilst looking after the child. The local council will carry out statutory checks on the carer(s) and make sure that carer(s) are capable of keeping the child safe. The local council will arrange to make regular visits to see how the child settled with the carer(s) and provide the carer with support.

If ECA students come to a Private Fostering arrangement, we will inform the local council six weeks before the arrangement begins as the law requires. If such arrangement come in an emergency, we shall notify the local council within 48 hours.

Health, safety and welfare policy

ECA strives to ensure the health, safety and welfare of everyone (including but not limited to staff, parents, students and homestays) involved in ECA business activities by strictly complying with UK safety laws (The Workplace Regulation 1992, Health and Safety at Work Act 1974). We have taken below actions:

- assigned a DSL role to be responsible for the monitoring, evaluation, and implementing of all safeguarding policies;
- Developed and promoted Code of Conduct for staff, students, and homestays;
- Plan the work to minimise all risks in respect of health, safety and welfare;
- Developed a complaints policy, which is followed in the event of serious breaches of safeguarding policies;
- Ensure there are adequate training opportunities for everyone to know
 - how to dial out for emergency services;
 - list of relevant numbers, including the nearest hospital, etc.
 - the location of the first aid box, the contents of which is met as recommended by HSE and how to use them;
- Promote best practice;
- Ensure procedures are followed for any accidents or incidents:
 - stop the work and contact a suitably qualified person and/or the emergency services
 - inform the DSL and contact the emergency contacts of the injured person
 - stay with the injured person till the emergency services arrive
 - ensure a responsible adult accompanies the injured person to the treatment centre
 - complete an appropriate accident report form

Reporting Accidents

In the event of an accident, no matter how minor it may appear at the time, it is vital to make a record of the accident on our company Accident Book.

Everyone must:

- Take reasonable care of their own health, safety and welfare and that of others who may be affected by his/her acts or omissions.
- Co-operate with DSL, schools on issues relating to health, safety, and welfare.
- Ensure reporting procedures are followed for any accidents or incidents and inform DSL of any serious allegations or concerns of poor practice.

Visit the Health and Safety Executive website www.hse.gov.uk for further information relating to Health and Safety Law and useful guidance.

Anti-Radicalisation – Prevent Duty Policy

Extremism and radicalisation are certainly safeguarding concerns. Understanding the terminology associated with Prevent will assist in our decision-making process. The following definitions are commonly used within Prevent:

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

Extremism: the vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces.

Terrorism: The use or threat of action designed to influence the government or an international governmental organisation or to intimidate the public, or a section of the public; made for the purposes of advancing a political, religious, racial or ideological cause; and it involves or causes:

- Serious violence against a person;
- Serious damage to property;
- A threat to a person's life;
- A serious risk to the health and safety of the public; or
- Serious interference with or disruption to an electronic system."

Channel: A Multi-Agency process, established in every local authority in England and Wales, and works to support vulnerable people from being drawn into terrorism, and provides a range of support including mentoring, counselling, theological support, and assistance with a range of other issues. Channel focuses on early intervention to try and protect vulnerable people from being drawn into Terrorism, and addresses all types of extremism.

Online training about Channel: www.safeguardingschools.co.uk/onlinechannel

Prevent is one of the four core elements of the Government's CONTEST strategy for countering terrorism. The other three elements are **Prepare**, **Pursue** and **Protect**. **Prevent** is a distinct part of the CONTEST Strategy focusing on early intervention through strategies which reduce the likelihood of individuals supporting a violent or extremist ideology or becoming terrorists.

It is recognised that the radicalisation process can be extremely complex, and that there is no single factor or indicator to identify an individual at risk of radicalisation. There are no academically proven checklists that exist which will accurately identify a person who is at risk of radicalisation, and who may, later, progress to committing acts of terrorism.

Information about the Channel process, including a description of the Vulnerability Assessment Framework (VAF) used by the Channel Panel to guide decisions about whether an individual

needs support to address their vulnerability to radicalisation can be found on Page 28 of the Government's Channel Duty Guidance: <https://www.gov.uk/government/publications/channel-guidance>

Following the latest version of the government guidance of "**The Prevent Duty: for schools and childcare provider**", ECA will ensure all staff have a good knowledge of the 4 themes of The Prevent Duty:

- Risk assessment: identifying "at risk" student(s)
- Working in partnership with local LSCB, community, schools and parents
- Staff training
- IT policies

ECA will work closely with local Safeguarding Children Partnership to safeguard and promote the welfare of children and young people. All staff will receive a proper training of "Workshop to Raise Awareness of Prevent" and the content on the website of "Education Against Hate" to have a better understanding of how to identify students at risk, how to support and protect them from extremism and radicalisation.

The DSL will, as the nominated **Prevent Lead**:

- Regularly assess the risk to students of being drawn into terrorism and draw up an action plan;
- Undertake prevent awareness training;
- Provide advice and support to other members of staff on protecting children from the risk of radicalisation;
- Contact Bradford Police Prevent Team on 01274 376088 should there be any concern of radicalisation;
- Cooperate with local authorities;

Students with following issues might be more vulnerable towards radicalisation as they are more likely to believe that extremist's claims are the answers to their problems:

- Sense of not belonging, such as distanced from their cultural or religious background
- Family issues
- Experiencing a traumatic event
- Experiencing racism or discrimination
- Difficulty in interacting socially and lacking empathy
- Difficulty in understanding the consequences of their actions
- Low self-esteem
- Being involved with gangs

The signs of radicalisation include:

- Isolating themselves from family and friends
- Talking as if from a scripted speech
- Unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others

- Increased levels of anger
- Increased secretiveness, especially around internet use.

It might not be obvious. It might be nothing. It might be something. But if any concerns relating to radicalisation, please report to the Prevent Lead (also act as DSL, 24/7 available) who will reach:

- 1) Department of Education via a dedicated helpline 020 7340 7264 (Monday to Friday from 9am to 6pm) or email counter.extremism@education.gsi.gov.uk; and/or
- 2) Local Children's Services Partnership; and/or
- 3) the NSPCC.

In the event of an immediate risk, Police on 999 should be contacted immediately.

Data Protection and Privacy Policy

At ECA, we are committed to protecting and respecting the personal data and your privacy.

Why we collect personal data

The personal data of our staff, students, their parents and homestay families which ECA collects and uses is gathered to enable ECA to perform guardianship services or serve other associated purposes. Occasionally, the collected personal data is also used for ECA to carry out its statutory obligations or meet any third party (re)accreditation or inspections. For example, we need to share personal information and contact details of our students, their parents, host families to AEGIS office, AEGIS lead and supporting inspectors for the purposes of a (re)accreditation.

What personal data do we collect

Student Personal Data – it is usually given to us by student/parents/guardians/representatives e.g. personal assistant, secretary, etc who are instructed by parents/guardians of the student.

The personal data we collect include but not limited to:

- Full name of students, parents, or their guardians
- contact details
- home or office addresses
- passport or other identity details
- medial details of the student
- copy or photos of passport(s) or/and ID card or/and BRP card
- photos

Host Family Personal Data – it is provided to us through an application form during initial application by email or social media, and further detail is provided by the host family during the home visit.

Information we hold, includes but not limited to:

- full name of all members of host family
- home address
- contact details
- photos of the family and property
- copy or photo of any passport or other identity information page
- insurance policies

How we share the personal data

Your personal data will remain strictly confidential with us, and it is always treated with discretion. Student and Host Family personal data is only shared with parents, schools, and

potential host families, except in the event of a safeguarding risk or medical emergency where it may be shared with local services.

ECA do NOT share personal data with any other third party without permission.

How we store personal data

- any physical documents provided to us are filed into our locked cabinet
- all scanned documents are filed in our password protected system

How long we keep the personal data

- for student, our retention period is as long as a student is under our guardianship plus seven years from termination of guardianship, as all records are integrated within our account's information
- if a student failed to join a school for some reason under our guardianship, the personal data we collected will be removed from our system
- all provided Student & Host Family Personal Data is stored in our system
- if a host family applied to host and decided not to host before hosting any ECA student, its personal data will be removed from the system
- The host family who have had hosted ECA student shall be held for a minimum of seven years after termination of the host family agreement.
- After seven years of inactivity, the personal data for students and host families is removed.

At ECA, students, parents, guardians or their representatives and host families often communicate and share personal details over email or social media e.g. whats app, wechat, and this can never be guaranteed to be secure. While we try our best to protect your personal data, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. We store your personal information through PC, Mac, hard disk, dropbox using password protection and anti-virus software.

As required by Data Protection Act, it is ETA's duty to notify the Information Commissioner's Office (ICO) about how we process personal information and to register with ICO.

Key principals of Data Protection Act 2018:

- **Fair, lawful, and transparent processing**
- **Purpose limitation** (data must only be collected for specified, explicit and legitimate purpose)
- **Data minimisation** (hold only necessary information)
- **Data accuracy** (data collected must be accurate and, where necessary, kept up to date)
- Data retention periods
- Data security
- Accountability (data collector must be able to prove that their data protection measures are sufficient)

Accordingly, ECA will:

1. explain in clear language how, why and where ECA will collect, process personal data
2. inform the purpose and details of sharing personal data
3. only ask for relevant personal data
4. make sure the accuracy of collected data and remind relevant individuals to update the data
5. make sure the data is not retained for longer than is necessary
6. make sure the data is safely stored from any loss, theft, or unauthorised disclosure/access, etc. Work conduct such as shredding any confidential waste, using strong passwords, installing firewalls, encrypting any personal data held electronically, keeping device under lock, etc. shall be carried out to enhance the security of the personal data.
7. adopt personal data protection procedures for every member to follow

Shall there be any inquiry about this policy, contact Data Controller Mrs. Yan Hu
admin@ecaeducation.com.

Regarding photographs of students, ECA has developed a separate photographic consent form for parents to compete in terms of using photographs of students.

Short Contacts List for Safeguarding Purposes

Organization	Contacts
ECA Education Consultancy Limited	Mrs Zheng FU (Christina) 07921 654766 (24/7 service)
Police (non-Emergency)	101
Police (Emergency)	999
Health Service	111
ChildLine	0800 1111 (24/7 free-dial) www.childline.org.uk
Leeds Safeguarding Children Partnership (LSCP)	Tel: 0113 3786 018 E-mail: lscp.info@leeds.gov.uk
Leeds LADO	0113 37 89687 (Monday to Friday) Tel: 0113 247 8652 LADO@leeds.gcsx.gov.uk
The Bradford Safeguarding Partnership	Telephone: 01274 434361 Email: TBPsafeguardingchildren@bradford.gov.uk
Bradford LADO	Tel: 01274 437 915
NSPCC 24-hour Child Concern	0808 800 5000 (for any adult concerned about a child)
NSPCC Whistleblowing Helpline	0800 028 0285 (8:00-20:00 Monday to Friday) help@nspcc.org.uk