

Greatway Guardianship and Educational Services Safeguarding 2026

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Greatway Guardianship and Educational Services Safeguarding and Child Protection Policy 2026

Policy Statement

Greatway recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We acknowledge that “it could happen here”. We make every effort to ensure that students and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

The purpose of this policy is to provide staff, volunteers and homestays with the framework they need in order to keep children safe and secure whilst they are in our care. The policy also informs parents, agents and partner schools how we will safeguard their children whilst they are in our care.

This policy is based on guidance from the most recent versions of *KCSIE* and *Working Together to Safeguard Children*. It also makes use of guidance from the NSPCC website.

Key Safeguarding Contact Details

Role	Name	Telephone Number	Email
Designated Safeguarding Lead (DSL)	Mitzi Powles	+44 (0)142 250393	mitzi@greatwayeducation.com
Deputy Designated Safeguarding Lead (DDSL)	Stephanie (Yingxia) Zhang	+44 (0)142 250393	stephanie@greatwayeducation.com
Greatway 24-Hour	Stephanie (Yingxia) Zhang	+44 (0)7539428055	stephanie@greatwayeducation.com

LSP	Emergency Duty Team	+44 (0)1452 614194 or 671051	mashearlyhelp@gloucestershire.gov.uk
LADO	Nigel Hatten	+44 (0)1452 426994	Nigel.hatten@gloucestershire.gov.uk

Child Protection Principles

The following principles underpin our provisions and practices in relation to safeguarding and child protection:

- **Greatway** will provide a safe and secure environment for all students;
- Homestays and transfer companies provide a safe and secure environment for all students;
- All students feel safe, secure and protected from harm;
- All students know who to turn to for help, advice or support, can access services confidentially, quickly and easily and have access to 24-hour support;
- The **Managing Directors** of the company have overall responsibility and accountability for the safeguarding and welfare of the students;
- All staff, homestays and volunteers share in the responsibility to protect students from harm, remain vigilant in identifying safeguarding and child protection issues and to follow policies and procedures relating to safeguarding and child protection;
- Students and staff have effective means by which they can raise child protection concerns or report issues;
- Staff have at least one reliable means to contact all students quickly and directly;
- Staff are aware of the medical or learning needs of individual students via the Student Record and these are shared with the homestay on a need to know basis;
- In cases where the whereabouts of a student under **Greatway** is not known or the student is believed to be at risk of harm, procedures to locate the student by the safest and quickest means possible, or secure the safety of the student will be invoked immediately by following the Missing Student policy;
- The company has procedures in place that enable child protection concerns and incidents to be dealt with promptly and effectively and in line with relevant legislation.

Greatway is committed to the protection of all children in its care. We are committed to safeguarding student welfare and undertake rigorous checks on all who work with us and we expect all staff, volunteers and homestays to share this commitment.

Safeguarding students is the responsibility of us all, including full-time, part-time, contracted, agency and volunteer staff including those who do not have cause to come into direct or regular contact with students in order to carry out their daily duties. It also applies to those who provide homestay accommodation for our students and third party contractors.

Where there is a safeguarding concern **Greatway** will ensure the child's wishes and feelings are taken into account. We provide clear information for students in the student handbook. We check that students understand the information and are comfortable about how they can raise a concern. We explain how concerns will be treated seriously, and that students can safely express their views and give feedback.

All staff and homestays should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

The safety and welfare of children, or Child Protection, means protecting children from physical, emotional or sexual abuse or neglect where there is an identified risk. Safeguarding is the minimisation of the risk to children from all forms of child abuse and safeguarding issues including for example:

- Child sexual exploitation
- Child on child abuse
- Radicalisation and extremism
- Female genital mutilation
- Physical, emotional, sexual abuse or neglect
- Domestic abuse
- Online abuse
- Bullying and cyber bullying
- Mental health

We aim to ensure that the students in our care experience at all times a caring and secure environment in which they feel safe, respected and valued.

In pursuit of this aim, **Greatway** undertakes the following:

1. We ensure that our director has the appropriate safeguarding knowledge and involvement in the procedures we have in place. This includes having oversight of arrangements.
2. Training is provided for all staff and homestays to a level appropriate for their role (see training section below);
3. We promote an environment of trust, openness and clear communication between students, school and **Greatway** staff and our Homestays, so that student welfare, safety and pastoral care is recognised as the top priority;
4. We respond to any reported allegation or suspicion of child abuse in accordance with the **Greatway** procedures as outlined below;
5. We ensure that all guardianship personnel, homestays and personnel offering outsourced services who come into direct contact with students in our care, are recruited using safer

recruitment practices and are formally screened through the completion of an enhanced DBS check;

6. We maintain links with the appropriate agencies who have a statutory responsibility to deal with child welfare and child protection concerns.
7. **Greatway** will self-report to AEGIS any significant safeguarding concerns or situation which could appear compromising or be misconstrued, or where behaviour has fallen below expected standards.

If you have any reason to believe that a child in your care is suffering from any form of abuse or neglect then please report it immediately in confidence to the DSL or DDSL using the contact details listed in this policy.

Supporting procedures and documents

This policy is to be read in conjunction with the following policies and documents:

- Anti-bullying and (including cyber-bullying) policy
- Anti-Radicalisation policy
- Online safety policy
- Emergency procedure (This includes information on the guardianship organisation's approach to foreseeable emergencies, such as a pandemic.)
- Low Level Concerns policy
- Missing student policy
- Safer Recruitment policy
- Staff and Homestay Code of Conduct
- Whistleblowing policy

Government guidance

- [Keeping children safe in education 2025 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672000/keeping-children-safe-in-education-2025.pdf)
- [Working together to safeguard children 2023](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/108114/Working-together-to-safeguard-children-2023.pdf)

Definitions

Term	What this means
Safeguarding and promoting the welfare of children	is defined as: <ul style="list-style-type: none"> ● protecting children from maltreatment;

	<ul style="list-style-type: none"> • preventing impairment of children's mental and physical health or development; • ensuring that children grow up in circumstances consistent with the provision of safe and effective care; • taking action to enable all children to have the best outcomes.
Child Protection	Is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Designated Safeguarding Lead (DSL)	This is the person identified as taking the lead in safeguarding matters in an organisation. This person (and any deputy) will be trained to a higher level.
Prevent	Prevent is the name given to part of the government's strategy to prevent terrorism by reducing the possibility of radicalisation.
Local Safeguarding Partnership (LSP)	Formerly Local Safeguarding Children Board (LSCB) and consisting of the local authority, the clinical commissioning group within the local authority and the chief office of police within the local authority.
LADO	The role of the Local Authority Designated Officer (LADO) is to coordinate all allegations and concerns made against a person who works with children.
Children	'Children' includes everyone under the age of 18.

Abuse, neglect and exploitation

(Taken from *Keeping Children Safe in Education* 2025)

- All staff, volunteers and homestays should be aware of the indicators of abuse, neglect and exploitation (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff and contracted inspectors are able to identify cases of children who may be in need of help or protection.
- All staff and contracted inspectors should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.
- All staff, volunteers and homestays, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.
- All staff, volunteers and homestays should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

If staff, volunteers or homestays are unsure, they should always speak to the DSL or deputy.

Types of abuse and neglect

(Taken from *Keeping Children Safe in Education* 2025)

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse,

including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

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

children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

(For specific types of abuse, please see the additional information at the end of this policy).

Signs of Abuse and Neglect

The following information has been taken from the NSPCC website [Types of Child Abuse & How to Prevent Them | NSPCC/](#). (This website page also includes further details on other specific signs of abuse including bullying and cyberbullying, child sexual exploitation, child trafficking, criminal exploitation and gangs, domestic abuse, FGM, grooming, non-recent abuse, and online abuse.)

Common signs

The NSPCC list the following as common signs that there may be something concerning happening in a child's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which cover their body

These signs don't necessarily mean that a child is being abused, there could be other things happening in their life which are affecting their behaviour – but we can help you to assess the situation.

You may also notice some concerning behaviour from adults who you know have children in their care, which makes you concerned for the child/children's safety and wellbeing.

Indicators of Physical Abuse

Bumps and bruises don't always mean a child is being physically abused. All children have accidents, trips and falls. And there isn't just one sign or symptom to look out for. But it's important to be aware of the signs.

If a child regularly has injuries, there seems to be a pattern to the injuries or the explanation doesn't match the injuries, then this should be reported.

Physical abuse symptoms include:

- bruises
- broken or fractured bones
- burns or scalds
- bite marks

It can also include other injuries and health problems, such as:

- scarring
- the effects of poisoning, such as vomiting, drowsiness or seizures
- breathing problems from drowning, suffocation or poisoning

Head injuries in babies and toddlers can be signs of abuse so it's important to be aware of these.

Visible signs include:

- swelling
- bruising
- fractures
- being extremely sleepy or unconscious
- breathing problems

- seizures
- vomiting
- unusual behaviour, such as being irritable or not feeding properly

Indicators of Emotional Abuse

There might not be any obvious physical signs of emotional abuse or neglect. And a child might not tell anyone what's happening until they reach a 'crisis point'. That's why it's important to look out for signs in how a child is acting.

As children grow up, their emotions change. This means it can be difficult to tell if they're being emotionally abused. But children who are being emotionally abused might:

- seem unconfident or lack self-assurance
- struggle to control their emotions
- have difficulty making or maintaining relationships
- act in a way that's inappropriate for their age

The signs of emotional abuse can also be different for children at different ages.

Children might:

- use language you wouldn't expect them to know for their age
- act in a way or know about things you wouldn't expect them to know for their age
- struggle to control their emotions
- have extreme outbursts
- seem isolated from their parents
- lack social skills
- have few or no friends.

Indicators of Sexual Abuse

Knowing the signs of sexual abuse can help give a voice to children. Sometimes children won't understand that what's happening to them is wrong or they might be scared to speak out. Some of the signs you might notice include:

Emotional and Behavioural signs

- Avoiding being alone with or frightened of people or a person they know
- Language or sexual behaviour you wouldn't expect them to know
- Having nightmares or bed-wetting
- Alcohol or drug misuse
- Self-harm
- Changes in eating habits or developing an eating problem

Physical Signs

- Bruises
- Bleeding, discharge, pains or soreness in their genital or anal area
- Sexually transmitted infections
- Pregnancy

If a child is being or has been sexually abused online, they might:

- spend a lot more or a lot less time than usual online, texting, gaming or using social media
- seem distant, upset or angry after using the internet or texting
- be secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet
- Children and young people might also drop hints and clues about the abuse

Indicators of Neglect

Neglect can be really difficult to spot. Having one of the signs doesn't necessarily mean a child is being neglected. But if you notice multiple signs that last for a while, they might show there's a serious problem. Children and young people who are neglected might have:

Poor appearance and hygiene

- being smelly or dirty
- being hungry or not given money for food
- having unwashed clothes

- having the wrong clothing, such as no warm clothes in winter

Health and development problems

- anaemia
- body issues, such as poor muscle tone or prominent joints
- medical or dental issues
- missed medical appointments, such as for vaccinations
- not given the correct medicines
- poor language or social skills
- regular illness or infections
- repeated accidental injuries, often caused by lack of supervision
- skin issues, such as sores, rashes, flea bites, scabies or ringworm
- thin or swollen tummy
- tiredness
- untreated injuries
- weight or growth issues

Housing and family issues

- living in an unsuitable home environment, such as having no heating
- being left alone for a long time
- taking on the role of carer for other family members

Change in behaviour

- becoming clingy
- becoming aggressive
- being withdrawn, depressed or anxious
- changes in eating habits
- displaying obsessive behaviour

- finding it hard to concentrate or take part in activities
- missing school
- showing signs of self-harm
- using drugs or alcohol

Procedures

When new staff, volunteers or homestays join our organisation, they are informed of the safeguarding arrangements in place, the name of the DSL (and DDSL) and how to share concerns with them. Please note that the usual reporting channel is via the DSL, however anyone can make a referral direct to the LSP or LADO. The contact details are included in this document.

Actions to be followed if there are concerns about a child or young person

- All staff members and homestays have a duty to identify and respond to suspected / actual abuse or disclosures of abuse. Any member of staff, volunteer or homestays who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the DSL (or, in their absence, the DDSL).
- Where there is risk of immediate harm, concerns will be referred immediately by telephone to the LSP Emergency Duty Team - +44 (0)1452 614194 or 671051 or the Police.
Less urgent concerns or requests for support, including for Early Help, will be sent by the DSL to the LSP via email to mashearylhelp@gloucestershire.gov.uk
- The DSL may also seek advice from Social Care or another appropriate agency about a concern, if we are unsure how to respond to it.
- The DSL will refer any safeguarding concerns that relate to an incident in school to the school. Concerns will be referred to the school DSL. If an allegation is made against a member of school staff, the guardianship organisation will check the school policy to see who to refer such matters to. This is usually the Head of the School. If the allegation involves the Head, then usually the chair of governors should be informed.
- Where a concern is not seen to reach the threshold for a referral, the DSL will keep the concern on file and will monitor the situation. Should the concern escalate, a referral will be made to the LSP.

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

How Greatway will respond to child-on-child Abuse

All staff and homestays should be aware that children can abuse other children (often referred to as child-on-child abuse) and that it **can** happen both inside and outside of school or college and online. That may mean it happens whilst students are in the care of homestays. It is important that all staff and homestays recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.

All staff and homestays should understand that even if there are no reports in their organisation it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff or homestays have **any** concerns regarding child-on-child abuse they should speak to the designated safeguarding lead (or deputy).

Greatway adopts a zero-tolerance to abuse. It is essential that **all** staff and homestays understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. It is recognised that it is more likely that girls will be victims and boys' perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi-nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Greatway has the following procedures that help to minimise the risk of child-on-child abuse:

- Regular training for staff and homestays.
- Educating students through our handbooks and through discussion.
- Providing students with clear guidelines within the student handbook on how to raise a concern.
- Fostering effective channels of communication so that students feel comfortable approaching their homestay carer or guardian with any concerns.
- Effective communication between the DSL (and DDSL) with the DSL in schools where students are placed.

In the event of a report of child-on-child abuse, staff and homestays should inform the DSL or DDSL as soon as possible.

How students can raise a concern

- It is important that students understand that any concern they raise will be treated seriously.
- Students will be encouraged to talk to any trusted adult, including school staff, their parents, homestay carer, their guardian or the guardianship organisation DSL/ DDSL. This will be explained to them verbally, with a written reminder included in the student handbook.

How allegations will be recorded, investigated and dealt with

- All reports of child-on-child abuse will be made on a case-by-case basis with the DSL or the DDSL taking a leading role using their professional judgement and supported by other agencies such as social care or the police as required.
- **Greatway** asks staff and homestays to follow the procedures outlined within this policy for [receiving a disclosure from a child or young person](#) and for [actions to be followed if there are concerns about a child or young person](#).
- Where a report includes an online element **Greatway** will follow advice on searching, screening and confiscation. Staff or homestays must not view or forward images unless unavoidable and only if another member of staff (preferably the DSL) is present. (The publication [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) section 2.10 explains the procedure to follow if it is felt that there is a clear reason to view such imagery.)
- The DSL will notify the DSL of the school that the student attends as soon as possible.

Risk Assessment

When there has been a report of sexual violence, the DSL (or DDSL) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- The victim, especially their protection and support;
- The alleged perpetrator; and
- All the other children (and, if appropriate, homestay family members) residing at a homestay, especially any actions that are appropriate to protect them;

Risk assessments will be recorded electronically and be kept under review.

The DSL (or a DDSL) will ensure they are engaging with their LSP.

How victims, perpetrators and any other children affected by child-on-child abuse will be supported

Greatway will support students who have been involved in child-on-child abuse.

This could include:

- Maintaining regular contact with the student/s to check on their welfare and provide an opportunity to talk.
- Providing homestays and staff information on a need-to-know basis so that they are able to offer support where appropriate.
- Working with the student's school to provide consistent support
- Making available the details of charities and helplines who can help students who have been affected by child-on-child abuse.

Management of the report

The DSL will decide how any cases of child-on-child abuse should be managed, in line with LSP thresholds. Depending on the severity, a report may be handled in the following ways:

- Manage internally (including liaising with the student's school DSL where appropriate)
- Early help
- Report to the LSP: Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to the LSP.
- Report to the police. Where a report of rape, assault by penetration or sexual assault is made, **Greatway** will consult with the police regarding how this case should be managed.

Greatway expects all staff and homestays to be clear on the policy and procedures with regards to child on child abuse outlined in this policy and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

Greatway acknowledges that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Allegations of abuse against a member of staff or homestay

Allegations that meet the threshold

- This guidance should be followed where it is alleged that anyone working, volunteering or hosting students for **Greatway** has:
 - behaved in a way that has harmed a child, or may have harmed a child and/or;
 - possibly committed a criminal offence against or related to a child and/or;
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children (known as transferable risk)
- In the event that there is an allegation against a member of staff, volunteer or homestay, **Greatway** will follow the guidance in the most recent version of *Keeping Children Safe in Education* Part 4.
- Allegations against a member of guardianship organisation staff, volunteers or homestays should be directed to the DSL of **Greatway** who will act as "case manager". The DSL must contact the LADO immediately and follow their advice. They **must not** investigate themselves before contacting the LADO. If the allegation is about the DSL, please contact the LADO directly.

- **Greatway** will report promptly to the DBS any person whose services are no longer used for regulated activity because they have caused harm or posed a risk of harm to a child.
- Any historical allegations should be referred to the police if they are made by an adult. If they are made by a child, they should be reported to the LADO.

Allegations that do not meet the threshold

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

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

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

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

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

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

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

The safety and wellbeing of students in our care is dependent on the vigilance of all our staff, volunteers and homestays and their prompt communication to the DSL or the Directors of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. **Greatway** is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside our care. The notification and prompt handling of all concerns about adults is fundamental to safeguarding students. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Our separate Low Level Concern Policy outlines how we will manage and record any low level concerns and take appropriate action to safeguard children.

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

Learning Lessons

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

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

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

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

How to receive a disclosure from a child or young person

- Victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.
- Reassure the child and listen carefully – it is important that they know you believe them.
- Do not say you will not say anything to anyone – in fact you have a duty to disclose this to another person so do not promise confidentiality.
- Make sure you take detailed notes, write everything down. If you are unable to take notes at the time, you should do so as soon as you are able.
- Ask open questions if appropriate, do not lead the conversation to find out what has happened. Use words such as tell me, explain or describe, and allow the student to speak.

- Avoid words such as what, why, how when – these will be asked by the relevant agency if appropriate.
- Ensure that you notify the police by calling 999 if you believe that the young person is at immediate or serious risk of harm.
- Contact the DSL: Mitzi Powles or DDSL: Stephanie Zhang as soon as practicable and in any case within 24 hours.
- If the disclosure is made out of hours, please use the emergency phone number +44 (0)7539428055.

Sharing Safeguarding Information

There will be occasions when safeguarding information will need to be shared with other parties in order to safeguard the individual(s) concerned. Information will be shared with guardianship organisation staff, homestays and the school's DSL (of the school that the student attends) who 'need to know' and with children's social care, the safeguarding partners, other organisations, agencies, and practitioners as required. Staff and homestays must ensure that any confidential information shared with them remains confidential and is handled in line with our data protection policy.

Greatway will be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

All staff and homestays must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff and homestays must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff and homestays are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the DSL and DDSL will only disclose information about a child to other members of guardianship organisation staff, homestays or the DSL of the school that the student attends on a need-to-know basis.

The DSL will always undertake to gain parent/carers consent to refer a child to Social Care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

Role of DSL and DDSL

The DSL will take lead responsibility for safeguarding and child protection (including online safety).

This is explicit in the role holder's job description. This person has the appropriate status and authority within the guardianship organisation to carry out the duties of the post.

The DDSL is trained to the same standard as the DSL and the role is explicit in their job description.

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff and homestays who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required (this may also be undertaken by the Prevent Lead, if the Prevent Lead is not the DSL);
- support staff and homestays who make referrals to the Channel programme (this may also be undertaken by the Prevent Lead, if the Prevent Lead is not the DSL);
- refer cases where a crime may have been committed to the Police as required.
- act as a point of contact with the three safeguarding partners;
- liaise with the directors to inform them of issues
- liaise with staff and homestays on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- act as a source of support, advice and expertise for all staff and homestays.
- understand the importance of information sharing, both within the guardianship organisation, and with the safeguarding partners, the DSL for the school the student attends, other agencies, organisations and practitioners
- encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, homestays and volunteers and in any measures the guardianship organisation may put in place to protect them; and,
- understand the difficulties that students may have in approaching staff and homestays about their circumstances and consider how to build trusted relationships which facilitate communication.
- ensure the guardianship organisation's child protection policies are known, understood and used appropriately;
- ensure the child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the directors regarding this;

- ensure the child protection policy is available for all relevant parties is on the **Greatway** website: www.greatwayeducation.com;
- link with the safeguarding partner arrangements to make sure staff and homestays are aware of any training opportunities and the latest local policies on local safeguarding arrangements.

Contact Details for the DSL and DDSL

Role	Name	Telephone Number	Email
DSL	Mitzi Powles	+44 (0)1242 250393	mitzi@Greatwayeducation.com
DDSL	Stephanie (Yingxia) Zhang	+44 (0)1242 250393	stepanie@Greatwayeducation.com
24-Hour emergency contact	Stephanie (Yingxia) Zhang	+44 (0)7539428055	stepanie@Greatwayeducation.com

Anti-Radicalisation and Prevent

Students may be susceptible to radicalisation into terrorism. Similar to protecting students from other forms of harms and abuse, protecting students from this risk is part of our safeguarding approach. **Greatway** has a separate policy that outlines our procedure for Anti-Radicalisation and Prevent. This can be found on our website, included in the Safeguarding Policy.

Prevent Lead Contact Details

Role	Name	Telephone Number	Email
Prevent Lead	Mitzi Powles	+44 (0)1242 250393	mitzi@Greatwayeducation.com

Record keeping

Greatway will keep full records of any safeguarding concern reported to them. All concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Safeguarding records will be stored securely and separately to the general student files. These will

be stored confidentially by the DSL in either a locked cabinet (hard copies) or a password protected file. Only the DSL and DDSL will have access to these files.

Records will be detailed and accurate (either handwritten or using appropriate secure online software). These will include all concerns about a student even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.

In summary, records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

Copies of any correspondence or notes from conversations with the LSP, school DSL or other external agency will be included in the file.

Greatway will ensure that the indication of the existence of the additional child protection file is marked on the student file record. Information will only be shared on a need-to-know basis in order to safeguard the student.

If in doubt about recording requirements, staff or homestays should discuss with the DSL (or DDSL).

Training and updates

Greatway will ensure that all staff and homestays receive training and regular updates that are suitable for their roles. A formal record of all safeguarding training will be kept.

DSL and DDSL

The DSL and DDSL will attend suitable face-to-face training. If training is completed online, it will be via a live course. This training will be renewed every two years.

Other staff and homestays

All other members of staff, volunteers and Homestays will receive appropriate safeguarding training to an appropriate basic awareness level (previously referred to as level 1), every three years. This will either be done online or in person. Members of staff, volunteers and Homestays who have already completed suitable safeguarding training for another provider that is still in date will not be

required to re-train. In this case the DSL will still need to ensure that the person fully understands **Greatway's** own procedures for safeguarding.

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

Whistleblowing

Greatway has a separate policy that outlines the whistleblowing procedures. These protect staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.

Local Safeguarding Partnerships (LSPs)

Greatway will liaise with their Local Safeguarding Partnership (LSP) and work in partnership with other agencies in line with *Working Together to Safeguard Children*.

Partner schools have their own safeguarding policies. These can be found on their website and will include the contact details for their LSP. **Greatway** recognises that if any safeguarding concerns occurred whilst a student was in a homestay that was out of the school's county then a different/additional LSP arrangement would be required as well. In this case, **Greatway** will contact the relevant LSP and follow their procedures. The website below provides a link to all of the LSPs in the country:

<https://www.safecic.co.uk/your-scb-acpc/55-free-downloads-and-safeguarding-links/61-safeguarding-children-board-links>

Details can be found on the Local Authority website and for the areas **Greatway** operates in the table below.

In the event of any contact information difficulties then **Greatway** will call the police as they are one of the partners.

The company is aware of how to access local agency contacts; this includes Local Safeguarding Partnerships across the country and how to access locally agreed inter-agency procedures and guidance. In addition, the company is aware of the non-emergency reporting procedures via the Local Authority's Children's Services relevant to the area or Multi-Agency Safeguarding Hub (MASH), or by telephoning the non-emergency Police number 101. For emergency situations, the company is aware of the need to contact the relevant police force for the area by dialling 999, this includes in Wales and Police Scotland.

The company is aware that in **Scotland**, for a non-emergency referral or concern they can contact the local children's social work team. Their contact details can be found on the website for the local

authority the child lives in, and in the table below. Alternatively they can contact the local office of Scottish Children’s Reporter Administration: <https://www.scra.gov.uk/contact-us/>

The company is aware that in **Wales** for a non-emergency referral or concern they can contact the local child protection services. Their contact details can be found on the website for the local authority the child lives in, and on the table below.

Contact Details for LSP and LADO where the Guardianship Organisation is located

Role	Name	Telephone Number	Email
LSP	Emergency Duty Team	+44 (0)1452 614194 or 671051	mashearlyhelp@gloucestershire.gov.uk
LADO	Nigel Hatten	+44 (0)1452 426994	Nigel.hatten@gloucestershire.gov.uk

Contact Details for LSPs and LADOs across the areas that Greatway operates

Area	Role and Name of contact	Telephone Number	Email
Monmouthshire: LSP / LADO	Children’s Duty and Assessment Team	+44 (0) 635669	ChildDuty@monmouthshire.gov.uk
	Emergency Duty Team	0800 328 4432	monmouthshire.gov.uk
Herefordshire: LSP / LADO	MASH	+44 (0)1432 260 800	cypd@herefordshire.gov.uk
	LADO Team	+44 (0)1432 261739	LADO@herefordshire.gov.uk

Liaison with parents/ agents and partner schools

- The guardianship organisation may be required to share confidential safeguarding information with the DSL of the school or college that the student attends. When a student moves school or college, safeguarding information may be shared with the DSL of the new

school. All schools and colleges have their own safeguarding and child protection policies that outline their procedures. These can be found on their websites.

- Whilst the guardianship organisation will work openly with parents as far as possible, it reserves the right to contact the LSP or the police, without notifying parents if this is believed to be in the child's best interests.
- **Greatway** will not usually share safeguarding information with agents unless it is necessary to safeguard the student. In this case information will be provided on a need-to-know basis and on the understanding that it should be kept strictly confidential.

Further Detail on specific types of abuse

The following information is taken from *Keeping Children Safe in Education*. It has been edited so that where appropriate, references to schools and colleges have been replaced with reference to guardianship organisations. This is to make it more relevant to the reader. Please refer to annex B of [Keeping children safe in education 2025 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/65146/keeping-children-safe-in-education-2025.pdf) for further details, including additional types of abuse.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately

Safeguarding issues

All staff and homestays should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues staff and homestays should be aware of include:

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Different forms of harm often overlap, and perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help keep them in education.

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen

locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home
- have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing. Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office and The Children's Society County Lines Toolkit For Professionals](#).

Mental Health

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.

Greatway 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.

Where students require medication for a mental health concern whilst with a homestay **Greatway** 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.

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.

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.

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 includes a Mental Health Support List (Appendix 10). 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.

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.

There may be instances where **Greatway** is asked to remove a student with mental health issues from a school setting. **Greatway** 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, **Greatway** will ask a member of school staff to complete and return the student removal form (see appendix 2) before removing the student from the school. This is to ensure that **Greatway** 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.

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Detailed advice is available in Part five of *Keeping Children Safe in Education*.

Staff and homestays should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT+ children are at greater risk.

Staff and homestays should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is incredibly important. How a school, college or guardianship organisation responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools, colleges and guardianship organisations not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff or homestays have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 51 in Part one of *Keeping Children Safe in Education*. As is always the case, if staff or homestays are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

Serious violence

All staff and homestays should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in

performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).

All staff and homestays should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy](#). Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence. Advice for schools and colleges is provided in the Home Office's [Criminal exploitation of children and vulnerable adults: county lines](#) guidance. The [Youth Endowment Fund \(YEF\) Toolkit](#) sets out the evidence for what works in preventing young people from becoming involved in violence. This is also useful advice for guardianship organisations.

Children who are absent from education

All staff and homestays should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should contact the student's school or college should they suspect a student is missing from education. The school or college will have a procedure for reporting this absence.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. [Modern slavery: how to identify and support victims - GOV.UK \(www.gov.uk\)](#)

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

So-Called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff or homestays have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a

mandatory reporting duty placed on teachers that requires a different approach (see annex B of *Keeping Children Safe in Education* for further details).

FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Whilst all staff or homestays should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers (and also regulated health and social care professionals in England and Wales). If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police. See Annex B of *Keeping Children Safe in Education* for further details.

Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools, colleges and guardianship organisations can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/forced-marriage). School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcd.gov.uk. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Domestic Abuse

The Domestic Abuse Act recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Guardianship organisations should be aware that students could potentially experience domestic abuse both in their own homes or whilst staying with homestays.

Online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If **Greatway** feels our students or staff are at risk, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Greatway recognises the risks posed to students online. Further information can be found in the online safety and anti-bullying (including cyber-bullying) policies.

Greatway provides training for staff, homestays and volunteers on online safety.

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 12.01.2026

Signed:

Yingxia Zhang

Date: 12.01.2026

[Signature]

Appendix 1: Incident Form

CHILD PROTECTION RECORD – Report of a Concern

Date of record:	
Date of incident:	

Name of referrer:		Role of referrer:	
Student name:			
Details of concern:	<ul style="list-style-type: none"> • use initials for other children / young people involved, unless there is a specific need to name them in full • contemporaneous notes, if taken, may be attached to this form 		

Reported to:		Role of person reported to:	
Signed:			

For DSL/ DDSL use:

Action taken:		Advice sought: <i>(from whom and what was advice given)</i>	
Concern / referral discussed with parent / carer?		<i>If not, state reasons why – if yes, note discussion with parent</i>	
Referral made:		<i>If not, state reasons why – if yes, record to whom and any action agreed</i>	
Feedback to referring member of staff or homestay:			<i>By whom</i>

Response to / action taken with student:		<i>By whom</i>
Name and contact number of key workers:		
Name and contact details of GP:		
Other notes / information / concerns:		
Any other action required:		

Appendix 2: Student removal form

In order for us to support our student as best as possible, we would appreciate it if you could complete the following student removal form. Please note that a representative of *insert guardianship organisation name* will not be able to collect the student until this form has been completed and returned to us by email: *insert email address*.

School Name	
Student Name	
Date of Birth	
Reason for request of removal of student	
Has the student been assessed by a medical professional?	Yes <input type="checkbox"/> No <input type="checkbox"/>

Date of assessment if applicable.	
Please provide a summary of assessment if applicable.	
Is the student at risk of harm to themselves?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Is the student a risk to others?	Yes <input type="checkbox"/> No <input type="checkbox"/>
Has the school followed its mental health and child protection policies and procedures? Please provide a copy of any relevant policies and procedures.	Yes <input type="checkbox"/> No <input type="checkbox"/>
Any other additional information we should be made aware of	
Signature	
Name	
Position	
Date	

Greatway Guardianship & Educational Services Anti-Bullying (including Cyber-Bullying) Policy

Policy Statement

The purpose of this policy is:

- to help prevent bullying from happening to students in our care
- to make sure bullying is stopped as soon as possible if it does happen and that those involved receive the support they need
- to provide information to all staff, homestays, volunteers, students and their parents about what we should all do to prevent and deal with bullying.

Greatway believes that:

- children and young people should never experience abuse of any kind;
- we have a responsibility to promote the welfare of all children and young people, to keep them safe and to practise in a way that protects them.

We recognise that:

- bullying causes real distress. It can affect a person's health and development and, at the extreme, can cause significant harm;
- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse;
- everyone has a role to play in preventing all forms of bullying (including online) and putting a stop to it.

Contact Details

Nominated anti-bullying lead

Name: **Stephanie Zhang**

Phone/email: 07539428055

Designated lead for safeguarding and child protection

Name: **Mitzi Powles**

Phone/email: 07397329883

NSPCC Helpline: 0808 800 5000

Policy

What is bullying?

Bullying may be repeated over time and intentionally hurts a student or group physically or emotionally and is often motivated by prejudice against particular groups, for example, on grounds of race, religion, culture, sex, gender, homophobia, special educational needs and disability, or

because a child is adopted or is a carer - it may occur directly or through cyber-technology (social websites, mobile phones, text messages, photographs and email).

Bullying includes a range of abusive behaviour that is:

- repeated;
- intended to hurt someone either physically or emotionally.

The NSPCC explains that bullying can take different forms. It could include:

- physical bullying: hitting, slapping or pushing someone;
- verbal bullying: name calling, gossiping or threatening someone;
- non-verbal abuse: hand signs or text messages;
- emotional abuse: threatening, intimidating or humiliating someone;
- exclusion: ignoring or isolating someone;
- undermining, constant criticism or spreading rumours;
- controlling or manipulating someone;
- making silent, hoax or abusive calls;
- racial, sexual or homophobic bullying (this is also a hate crime);
- bullying someone because they have a disability (this is also a hate crime).

The NSPCC explains that no single sign will indicate for certain that a child is being bullied, but watch out for:

- belongings getting 'lost' or damaged;
- physical injuries, such as unexplained bruises;
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school;
- not doing as well at school;
- asking for, or stealing, money (to give to whoever is bullying them);
- being nervous, losing confidence, or becoming distressed and withdrawn;
- problems with eating or sleeping;

- bullying others.

Who is at risk?

The NSPCC explain that any child can be bullied for any reason. If a child is seen as different in some way or seen as an easy target they can be more at risk.

This might be because of their:

- race or ethnic background
- gender
- sexual orientation.

Or it could be because they:

- appear anxious or have low self-esteem
- lack assertiveness
- are shy or introverted.

Popular or successful children are also bullied, sometimes because others are jealous of them. Sometimes a child's family circumstance or home life can be a reason for someone bullying them.

Disabled children can experience bullying because they seem an easy target and less able to defend themselves.

Further reading

Further information on bullying (including cyber-bullying) can be found on the NSPCC website <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/bullying-and-cyberbullying/>

Prevention

Greatway will seek to prevent bullying by:

- developing a code of behaviour that sets out how everyone involved in our organisation is expected to behave, in face-to-face contact and online, and within and outside of our activities;
- holding discussions with staff, homestays, volunteers and students in our care about bullying and how to prevent it. These discussions will focus on:
 - group members' responsibilities to look after one another and uphold the behaviour code;
 - practising skills such as listening to each other;
 - respecting the fact that we are all different;
 - making sure that no one is without friends;
 - dealing with problems in a positive way;
 - checking that our anti-bullying measures are working well.

- providing support and training for all staff, homestays and volunteers on dealing with all forms of bullying, including cyber bullying, racial, sexist, homophobic and sexual bullying;
- making sure our response to incidents of bullying takes into account:
 - the needs of the person being bullied;
 - the needs of the person displaying bullying behaviour;
 - needs of any bystanders;
 - our organisation as a whole.
- reviewing the plan developed to address any incidents of bullying at regular intervals, in order to ensure that the problem has been resolved in the long term;
- Making parents fully aware of our procedures by providing them with a copy of this policy.

Cyber Bullying

What is Cyber Bullying?

The NSPCC website explains that cyberbullying is bullying that takes place online. Unlike bullying offline, online bullying can follow the child wherever they go, via social networks, gaming and mobile phone and can include:

- sending threatening or abusive text messages
- creating and sharing embarrassing images or videos
- trolling – the sending of menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online games, activities or friendship groups
- shaming someone online
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll
- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name
- sending explicit messages, also known as sexting
- pressuring children into sending sexual images or engaging in sexual conversations.

Cyberbullying is just one type of online abuse. Further details on the different types and signs, as well as how to help keep students safe online can be found in our online safety policy.

Procedures

We will take seriously and investigate any bullying or cyber-bullying concerns that are reported to us:

- Students will be made aware that they can talk to their parents, teachers, homestay, or a member of **Greatway** staff about any bullying concerns they may have;
- **Greatway** staff member may receive a report of suspected online abuse from a student, parent or other source by face to face disclosure, email or telephone call. This disclosure will be recorded in writing by the member of staff (using the 'Tell Explain Describe' model if the information is being given by a student);
- Any concerns raised by a student, parent, homestay, member of staff or other source will be reported within 24 hours to Stephanie Zhang. The written record (see above) must be submitted at this time;
- The DSL will hold an emergency strategy meeting to discuss the incident, assess the alleged threat and risk to the student (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. Written notes will be kept securely of this meeting by the DSL;
- The 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;
- Any concerns that bullying (including cyber-bullying) has taken place at a student's school will be referred to the DSL of the school concerned;
- If the alleged bullying incident involves a member of the homestay family, or another student staying at the homestay, **Greatway** will investigate fully as outlined above and, if necessary find alternative accommodation for the student;
- In most cases parents will be kept informed about the situation and the actions that **Greatway** is taking unless there is good reason to believe that involving these parties would put the young person at risk of harm;
- We will support the victim and the perpetrator (if they are a student in our care) and monitor students well-being following a bullying incident for as long as necessary;
- Where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' due to bullying, we will refer the matter to local agencies;
- Please note that strong sanctions such as termination of our contract may be necessary in cases of severe and persistent bullying;
- Full records will be kept of any bullying concerns and of any actions taken. These will be held confidentially by **Stephanie Zhang**.
- Whilst it is acknowledged that bullying may be repeated over time, we will take action in response to a single incident and make an appropriate record.

Specific cyber-bullying procedures in addition to the above

- In the case of cyber-bullying support for the student 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 by accredited organisations such as the school, National Society for the Prevention of Cruelty to Children (NSPCC), Childline, National Crime Agency (NCA), Child Exploitation and Online Protection Centre (CEOP) websites and helplines;

- The DSL will ensure that viewing of any 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 any imagery or other content. The 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. If the DSL feels that it is necessary to view any imagery, they will follow the guidance in the <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>. This includes ensuring that there is another senior member of staff present, ideally of the same sex of the as the student in the images when the viewing takes place. (Section 2.10 of *Sharing nudes and semi-nudes: advice for education settings working with children and young people* explains the procedure to follow if it is felt that there is a clear reason to view such imagery);
- The 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 including those present, date and time;
- 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 any imagery or other content suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent;
 - Any imagery or other content involves sexual acts and any pupil in the imagery is under 13;
 - You have reason to believe a student is at immediate risk of harm owing to the sharing of any 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 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 **Greatway** support framework and network for the child.

- If the DSL has decided that other agencies do not need to be involved, then consideration should be given to deleting any imagery or other content to limit any further sharing. In most cases, children and young people should be asked to delete any imagery or content and to confirm that they have deleted them. They should be given a deadline for deletion across all devices, online storage or social media sites. They should be reminded that possession of nudes and semi-nudes is illegal (if this is what the issue was). They should be informed that if they refuse or it is later discovered they did not delete such imagery, they are continuing to commit a criminal offence and the police may become involved. A record will be made of these decisions as per the Safeguarding Policy including decisions, times, dates and reasons.
- Any decision to search a child or young person's device and delete imagery will be based on the professional judgement of the DSL (or equivalent) and will always comply with the safeguarding and child protection policy and procedures of **Greatway**. All of these decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers will also be informed unless this presents a further risk to any child or the young person;
- 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;
- Where police action has been instigated for an incident involving a member of staff or volunteer, **Greatway** 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.

Responding to an incident of the sharing of nudes and semi-nude imagery

- **Greatway** will follow the guidance in https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview?utm_source=chatgpt.com when responding to an incident of sharing nudes and semi-nudes.

Related policies and procedures

This policy statement should be read alongside our organisational policies and procedures including:



- Safeguarding and Child Protection policy
- Code of conduct for staff, homestays and volunteers

- Student behaviour code of conduct
- Online Safety Policy

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 12th January 2026

Signed: 


Date: 12.01.2026

Greatway Guardianship and Educational Services Online Safety Policy

Policy Statement

This document is based on the most recent guidance from the Department for Education *Keeping Children Safe in Education*, and NSPCC advice on Online Safety. The effectiveness of the policy will be monitored and reviewed annually through the number of reported incidents of a breach of online safety.

Staff and Homestays

The **Greatway** Code of Conduct for Staff and homestays has been made available and explained to staff and homestays to ensure that there is an awareness of how to communicate online with students as well as how to minimise the risks attached to digital and video images of them. Homestays play a crucial role in ensuring that the students who stay with them use the internet and mobile devices in accordance with the guidance contained within this policy and the Homestay Handbook. The DSL (or DDSL in their absence) takes the lead with online safety and will deal with any concerns raised as outlined in the procedures included in this policy.

Training

Greatway's DSL will complete additional online safety training where this is not sufficiently covered within their safeguarding training undertaken and will then ensure that the appropriate information is disseminated to all staff and homestays.

Key Safeguarding Contact Details

Role	Name	Telephone Number	Email
Designated Safeguarding Lead (DSL)	Mitzi Powles	+44 (0)142 250393	mitzi@Greatwayeducation.com
Deputy Designated Safeguarding Lead (DDSL)	Stephanie (Yingxia) Zhang	+44 (0)142 250393	stephanie@Greatwayeducation.com

Students

Students are responsible for using the internet and mobile devices in accordance with the guidance in the Student Handbook. Students will be informed about the importance of adopting good online safety practice and reporting misuse, abuse or access to inappropriate materials and how to report these concerns. **Greatway** further supports students in raising their awareness of how to stay safe online through our social media updates, policies and website.

Online Safety – Areas of risk

It is essential that students are safeguarded from potentially harmful and inappropriate online material. An effective approach to online safety empowers a school, college, guardian or homestay to protect and educate children in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and

- commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

What is online abuse?

The NSPCC define online abuse as any type of abuse that happens on the internet. It can happen across any device that's connected to the web, like computers, tablets and mobile phones. And it can happen anywhere online, including:

- social media,
- text messages and messaging apps,
- emails,
- online chats,
- playing online games
- live streaming sites.

Children and young people may experience cyberbullying (bullying that takes place using technology including social media sites, mobile phones, gaming sites), grooming (building an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking), sexual abuse, 'sexting' or youth produced imagery, sexual exploitation, county lines gang recruitment, radicalisation or emotional abuse from people they know as well as from strangers. It might be part of other abuse which is taking place offline, like bullying or grooming. Or the abuse might only happen online.

Greatway clearly has a role to play in reporting signs of possible online abuse early so that prompt action can be taken to protect any children who are found to be at risk. **Greatway** has a policy for Anti-bullying (including cyber-bullying) that outlines how incidences of cyber-bullying will be addressed.

Possible signs of online abuse:

The NSPCC list possible signs of a child experiencing abuse online if they demonstrate a change in behaviour or unusual behaviour:

- spend a lot more or a lot less time than usual online, texting, gaming or using social media
- seem distant, upset or angry after using the internet or texting

- be secretive about who they're talking to and what they're doing online or on their mobile phone
- have lots of new phone numbers, texts or email addresses on their mobile phone, laptop or tablet.

Some of the signs of online abuse are similar to other abuse types, including cyberbullying, grooming, sexual abuse, child sexual exploitation. These can be found on the NSPCC website <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

The possible signs of abuse could be seen through reports from students or schools, incident reporting by staff, and/or Local Co-ordinator reports. In response to a safeguarding report the matter would be dealt with in accordance with the 'Safeguarding and Child Protection' Policy and Process.

Set Boundaries

Greatway encourage staff and homestays 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 homestay to restrict internet access for an agreed period of time. Below is some suggested advice for talking to children about online safety:

[Having a conversation with your child \(thinkuknow.co.uk\)](https://www.thinkuknow.co.uk)

[Teaching Your Child about Internet & Online Safety | NSPCC](https://www.nspcc.org.uk/teaching-your-child-about-internet-online-safety/)

Filters and monitoring

Greatway asks homestays to be doing all that they reasonably can to limit children's exposure to the above risks from the IT systems at the home. As part of this process, homestays should ensure appropriate filters and monitoring systems are in place. Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, homestays should consider the age range of their pupils, the number of pupils, and how often they access the IT system.

Homestays are asked to use privacy settings, parental controls and built-in internet safety features provided by the major internet service providers. The UK Safer Internet Centre has guides for parental controls (homestays)

<https://saferinternet.org.uk/online-issue/parental-controls>

The NSPCC provide advice for homestays on parental controls which allow a number of different things to happen including planning what time of day children can go online for, filtering and

blocking content, setting different profiles so that each family member can access age appropriate content and restricting information that can be shared: <https://www.nspcc.org.uk/keeping-children-safe/online-safety/parental-controls/>

Staying safe on mobiles, smartphones and tablets

The NSPCC has advice for staying safe on all types of devices, including mobiles, smartphones and tablets. Full details can be found on the website:

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/>

Childline also provide useful information for students:

<https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/> This includes guidance on a range of issues, including specific guidance on mobile phones safety and sexting.

Information on sexting and sending nudes can be found here:

<https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/>

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/sexting-sending-nudes/>

Childnet have produced a very useful guidance for students who have made a mistake sending nude pictures:

<https://www.childnet.com/help-and-advice/nudes-11-18-year-olds/>

Social network sites

Children and young people connect online with friends, make new friends and browse the internet for information, chat with others and play games. This may include using search engines, sharing images, watching videos, using social network sites, using apps, playing games and chatting with people through online gaming.

Homestays are advised to ensure that their own children and/or **Greatway** students know where the reporting functions are on each of the sites they use, how to block someone and how to keep information private.

The NSPCC encourage talking to children about online safety:

<https://www.nspcc.org.uk/keeping-children-safe/online-safety/talking-child-online-safety/>

Further reading:

NSPCC Online Safety: <https://www.nspcc.org.uk/keeping-children-safe/online-safety/>

Child Exploitation and Online Protection Centre:

CEOP: Child Exploitation & Online Protection Centre – internet safety

CEOP: Thinkuknow: [CEOP Education \(thinkuknow.co.uk\)](https://www.thinkuknow.co.uk)

UK Safer Internet Centre:

[Homepage - UK Safer Internet Centre](https://www.saferinternet.org/)

Internet matters – helping parents keep their children safe online:

[Information, Advice and Support to Keep Children Safe Online \(internetmatters.org\)](https://www.internetmatters.org/)

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

[The use of social media for online radicalisation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/briefing-notes/2015/06/the-use-of-social-media-for-online-radicalisation)

Procedure for dealing with an incident which involves online services:

1. **Greatway** staff member receives the report of suspected breach in online safety from a student, parent or other source by face-to-face disclosure, email or telephone call.
2. **Greatway** Staff member adheres to the 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 the Designated Safeguarding Lead (DSL). The staff member must submit a written record of the disclosure to the DSL.
4. The DSL will hold an emergency strategy meeting to discuss the incident, assess the alleged threat and risk to the child (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 listing all actions and updates.
6. The 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, National Society for the Prevention of Cruelty to Children (NSPCC), Childline, National Crime

Agency (NCA), Child Exploitation and Online Protection Centre (CEOP) websites and helplines.

7. The DSL will ensure that viewing of any 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 any imagery or other content. The 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. If the DSL feels that it is necessary to view any imagery, they will follow the guidance in the guidance [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people). This includes ensuring that there is another senior member of staff present, ideally of the same sex of the as the student in the images when the viewing takes place. (The publication *Sharing nudes and semi-nudes: advice for education settings working with children and young people* explains the procedure to follow if it is felt that there is a clear reason to view such imagery in section 2.10.)

8. The 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 including those present, date and time.

9. The DSL will consider the need to contact another 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 any imagery or other content suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- Any imagery or other 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 any 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

Exploitation Online Protection Unit (CEOP) 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 **Greatway** support framework and network for the child.

11. If the DSL has decided that other agencies do not need to be involved, then consideration should be given to deleting imagery or other content to limit any further sharing. In most cases, children and young people should be asked to delete the imagery or content and to confirm that they have deleted them. They should be given a deadline for deletion across all devices, online storage or social media sites. They should be reminded that possession of nudes and semi-nudes is illegal (if this is what the issue was). They should be informed that if they refuse or it is later discovered they did not delete such imagery, they are continuing to commit a criminal offence, and the police may become involved. A record will be made of these decisions as per the Safeguarding Policy including decisions, times, dates and reasons.

Any decision to search a child or young person's device and delete imagery will be based on the professional judgement of the DSL (or equivalent) and will always comply with the safeguarding and child protection policy and procedures of **Greatway**. All of these decisions need to be recorded, including times, dates and reasons for decisions made and logged in the safeguarding records. Parents and carers will also be informed unless this presents a further risk to any child or the young person.

12. 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.

13. Where police action has been instigated for an incident involving a member of staff, homestay or volunteer, **Greatway** 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.

Responding to an incident of the sharing of nudes and semi-nude imagery

As mentioned above, **Greatway** will follow the guidance in [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people) when responding to an incident of sharing nudes and semi-nudes.

Remote learning

Staff and homestays should be aware that where students are being asked to learn online at home, schools will have a remote learning policy which should be referred to when homestays and guardians are supporting a student to learn remotely. The DfE has provided advice to support schools and colleges do so safely, including [Safeguarding and remote education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/safeguarding-and-remote-education) The NSPCC also provide helpful advice: [Safeguarding and child protection for tutors \(www.gov.uk\)](https://www.nspcc.org.uk/keeping-children-safe/keeping-children-safe-at-school/safeguarding-and-child-protection-for-tutors)

The Prevent Duty

Greatway pays due regard to the Prevent Duty and recognises that there is a risk of students being exposed to radicalisation or extremist views online. Signs of online radicalisation may include spending increasing amounts of time talking to people with extreme views online, or searching inappropriate websites linked to terrorism ideology. Staff and homestays should remain vigilant and report any concerns to the Prevent Lead. Please see our anti-radicalisation policy for further details.

Review

We are committed to regularly reviewing our policy and good practice. Technology, and risks and harms related to it, evolve, and change rapidly. **Greatway** will carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face.

This policy was last reviewed on: 12.01.2026

Signed:



Date: 12.01.2026

Greatway Guardianship & Educational Services Anti-Radicalisation Policy

Policy Statement

Greatway recognise the importance of making all individuals aware of the Prevent Strand of the national Contest strategy, the policy and procedure to follow if they identify any concerns in relation to radicalisation and extremism, and how we can work with partners to protect children from this form of child abuse.

Legislation

Contest is the name of the UK's strategy to respond to the threat of domestic and international extremism, and the steps that need to be taken to protect the public. The strategy aims to reduce the risk to the UK and our assets overseas, so that people can go about their lives freely and with confidence. Contest is split into four strands:

PREVENT – to stop people becoming terrorists or supporting terrorism

PROTECT – to strengthen our protection against terrorist attacks

PURSUE - to stop terrorist attacks

PREPARE- when an attack cannot be stopped to mitigate its impact

Since July 2015 schools and colleges have been subject to section 26 of the Counter-Terrorism and Security Act 2015, which states that in the exercise of their functions they are to have “due regard to the need to prevent people from being drawn into terrorism” i.e. the unofficial or unauthorised use of violence and intimidation in the pursuit of political aims.

This duty is known as the Prevent Duty and applies to a wide range of public-facing bodies.

The Prevent strategy was revised in Paragraph 17 – March 2024 and has the three following objectives:

1. Tackle the ideological causes of terrorism;

2. Intervene early to support people susceptible to radicalisation;
3. Enable people who have already engaged in terrorism to disengage and rehabilitate.

This duty is passed onto schools in the statutory guidance *Keeping Children Safe in Education*, which states that protecting children from the risk of radicalisation (i.e. the process where someone is lead to adopt extreme political, social and religious ideals and aspirations), should be seen as part of schools' and colleges' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse:

“Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised.”

Greatway staff, volunteers and homestays should be alert to reports of changes in children's behaviour which could indicate that they may need help or protection. Staff, volunteers and homestays are encouraged to use their judgement in identifying children who may be at risk of radicalisation and to report any concerns to the Designated Safeguarding Lead (DSL) **Mitzi Powles**. This may result in the DSL making a referral to the Channel programme. The guardianship organisation's DSL (and any deputies) should be aware of local procedures for making a Prevent referral.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages.

Guidance on Channel is available at: <https://www.gov.uk/government/publications/channel-guidance>

Policy

Staff members, volunteers and homestays are expected to have a general understanding of the risks affecting children and young people, how to identify individual children who may be at risk of radicalisation and what to do to support them. This policy outlines a clear procedure for protecting children at risk of radicalisation.

Greatway understands that the Prevent duty builds on existing partnerships for example with schools, parents and Local Safeguarding Partnerships. This policy considers the need for effective engagement with partners who are in key positions to spot signs of radicalisation (where this would not expose the child to further risk) and the need to be able to offer assistance and advice to those who raise concerns, and who require signposting to the right support mechanism. **Greatway** has a DSL who is responsible for dealing with any concerns in relation to radicalisation:

Designated Safeguarding Lead Contact Details

Role	Name	Telephone Number/s	Email
Designated Safeguarding Lead	Mitzi Powles	01242 250493 Ext:248-Office hours 07397329883	mitzi@inlingua-cheltenham.co.uk
24-hour emergency contact	Stephanie (Yingxia) Zhang	07539428055	stephanie@Greatwayeducation.com

Greatway understands the importance of awareness training for staff, volunteers and homestays to identify children at risk of being drawn into terrorism and to challenge extremist ideas (i.e. extreme political or religious views). Staff, volunteer and homestay training needs are assessed internally with the DSL being the point of advice and support for staff, with regular safeguarding updates being circulated.

Greatway ensures that staff, volunteers and homestays have an awareness of the advice offered to schools by the Department for Education on the Prevent duty. The Government has launched the 'educate against hate' website which provides information, tools and resources needed to recognise and address extremism and radicalisation in children and young people.

Recognising risks and vulnerabilities of radicalisation

Children and young people can be drawn into violence or exposed to messages of extremist groups by many means, including family or friends influences, direct contact with extremist groups of organisations, **and** through the internet.

The risk of radicalisation may be combined with other vulnerabilities including:

Identity Crisis – Distance from cultural/religious heritage and uncomfortable with their place in the society around them;

Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging;

Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;

Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life;

Criminality – Experiences of imprisonment; poor resettlement / reintegration; previous involvement with criminal groups.

Potential risk indicators include:

- Use of inappropriate language
- Possession of violent extremist literature or accessing extremist websites
- Behavioural changes
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Articulating support for violent extremist causes or leaders
- Using extremist views to explain personal disadvantage
- Joining or seeking to join extremist organisations
- Seeking to recruit others to an extremist ideology.

Some children may be at risk due to living with or being in direct contact with known extremists.

Greatway will assess the specific risks of radicalisation for the students in our care and review this risk assessment at least annually.

Working with partners to protect children

Greatway recognises the opportunity that the company has to support partners including schools and medical professionals in helping to protect and support children and young people at risk of radicalisation. Disclosures and concerns can be reported to **Greatway** staff in relation to our own students, and also in relation to other children and young people who our students may be in contact with.

As radicalisation and extremism are forms of child abuse, **Greatway** is aware of the duty to report cases or concerns in line with the company's Safeguarding and Child Protection Policy. The DSL will make a report to the police or the anti-terrorist hotline on 0800 789 321 for potential terrorist or extremist activity. Non-urgent concerns will be reported by the DSL to the Prevent Single Point of Contact within the relevant police force.

Staff should be aware that anonymous reports of suspicious activity can be reported through Crimestoppers on 0800 555 111 or via police force websites. Anonymous reports of potential terrorist or extremist activity can also be made to the anti-terrorist hotline on 0800 789 321.

Awareness Training for Staff, Volunteers and Homestays

Our DDSL has completed Prevent/ Anti-Radicalisation training. The following sites provide online training for staff, volunteers and homestays who can regularly self-brief on how to identify children and young people who are at risk of radicalisation and extremism. Staff, volunteers and homestays are expected to use these tools to complement the safeguarding training provided by **Greatway**.

The Home Office has developed three e-learning modules:

- Prevent awareness e-learning offers an introduction to the Prevent duty. <http://www.elearning.prevent.homeoffice.gov.uk/>
- Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention. <https://www.elearning.prevent.homeoffice.gov.uk/preventreferrals>
- Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel. https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html

Government website with advice offered to schools: <https://educateagainsthate.com/>

Procedure for reporting concerns

1. **Greatway** staff member receives a report about a child or young person displaying indicators of radicalisation from a student, member of staff at a school, parent, homestay or other source by face to face disclosure, email or telephone call, or staff member develops concerns that a child or young person is displaying possible indicators of radicalisation
2. **Greatway** staff member adheres to the 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), or reporting their concerns in writing to the **DSL, Mitzi Powles - mitzi@inlingua-cheltenham.co.uk**
3. The record of the disclosure is reported verbally as soon as practicable to the **DSL, Mitzi Powles - mitzi@inlingua-cheltenham.co.uk**
4. The staff member must submit a written record of the disclosure or concern to the **DSL, Mitzi Powles - mitzi@inlingua-cheltenham.co.uk**
5. The DSL will hold an emergency strategy meeting to discuss the incident, assess the alleged threat and risk to the child, implement an action plan and continue to review the situation until a resolution has been achieved. The meeting will be recorded with timed and dated entries within an Incident Record to record all actions and updates.
7. The incident will be referred to a statutory agency for further review where this is a necessary, relevant and proportionate course of action where a child or young person may be at risk of suffering significant harm or in need of support.

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 12th January 2026

Signed:



Date: 12.01.2026

Greatway Guardianship and Educational Services Low Level Concern Policy

Low level concerns

The safety and wellbeing of students in our care is dependent on the vigilance of all our staff and their prompt communication to the Director of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. All references in this section to "adult" should be interpreted as meaning any adult, including staff, volunteers, homestays, visitors to homestay families, school staff and other adults who work with our organisation, unless otherwise stated. **Greatway** is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse arising from situations or persons outside our care. The notification and prompt handling of all concerns about adults is fundamental to safeguarding students. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours.

Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated. We are a 'telling' organisation. If you are concerned about the behaviour or actions of any adult who works for or with **Greatway** you should speak to the Director. It is imperative that staff understand the importance of reporting any concerns that they may have.

What is a low level concern?

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

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

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

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

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

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold (see Part Four - Section one of *Keeping Children Safe in Education*), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of **Greatway** from potential false allegations or misunderstandings.

Code of Conduct

All staff and homestays must behave responsibly and professionally in all dealings with students and specifically with those for whom they have a duty of care. All staff and homestays must follow the procedures set out in our 'Staff and Homestay Code of Conduct'. Staff and homestays should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff or homestay and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff and Homestays have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

Staff and Homestays should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. Any person working for or with **Greatway** are deemed to have a position of trust, even if the member of staff does not directly work with the student.

Our low level Concern Policy

The overarching aim of the low level Concern Policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored and reinforced by all staff and homestays. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff and homestays are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines;
- ensure staff and homestays feel empowered to raise any low level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct; and Safeguarding and Child Protection Policy and Procedure;
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

Low level Concerns about self (self-reporting) or others

Self-reporting

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the guardianship organisation sees self-reporting of low level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Concerns about others

From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a low level Concern.

What should I do if I have a concern?

Where a low level concern exists it should be reported to the Director as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident).

How will my low level concern be handled?

The Director will discuss all low level concerns she receives with the DSL as soon as possible and in any event within 24 hours of becoming aware of it. The Director will, in the first instance, satisfy herself that it is a low level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure (outlined later in this document). The circumstances in which a low level concern might be reclassified as an allegation are where:

- the threshold is met for an allegation
- there is a pattern of low level concerns which collectively amount to an allegation or

- there is other information which when taken into account leads to an allegation.

Where the Director is in any doubt whatsoever, advice will be sought from the LADO, if necessary on a no-names basis. Having established that the concern is low level, the Director as appropriate will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

If the concern has been raised via a third party, the designated safeguarding lead will collect as much evidence as possible by speaking:

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

Recording low level Concerns

All low level concerns should be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible. The record will include the rationale for the Director's decisions and action taken.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, **Greatway** will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the guardianship organisation that enabled the behaviour to occur and where appropriate policies will be revised or extra training delivered to minimise the risk of it happening again.

What records will be kept?

Greatway will store records of low level concerns in a central file which logs all concerns of this nature. These are kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records are necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file unless either:

- a) the concern (or group of concerns) has been reclassified as an allegation as above; or Safeguarding and Child Protection Policy and Procedure
- b) the concern (or group of concerns) is sufficiently serious to result in formal action under the guardianship organisation's grievance, capability or disciplinary procedure.

Greatway will retain such information until the individual leaves their employment.

References

In line with the guidance in Part three of *Keeping Children Safe in Education*, we will only provide substantiated safeguarding allegations in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. However, where a low level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, this will be referred to in a reference.

Contact Details

Director

Name: Stephanie Zhang

Phone/email: stephanie@greatwayeducation.com / 07539428055

Designated lead for safeguarding and child protection

Name: Mitzi Powles

Phone/email: mitzi@inlingua-cheltenham.co.uk / 07397329883

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 12th January 2026

Signed:



Date: 12/01/2026

Greatway Guardianship and Educational Services Missing Student Procedure

Statement

This policy is designed to be implemented in cases where students are believed to be absent or missing from the care of **Greatway**. The purpose of the policy is to locate the student by the safest and fastest means possible.

Greatway is committed to safeguarding and promoting the welfare of children and young people.

This policy is required to ensure that missing or absent students (who are not under the duty of care of the school), are subject to an appropriate response by **Greatway**. This is to ensure that children are found and returned to an approved location as soon as practicable.

The benefits of this policy are that all reports of missing/absent people will be recorded. The policy provides a model and framework for response and dealing with incidents dependent on the risk posed. This policy is applicable to all staff members who may become involved in the initial stages of a report of a missing child or young person.

Greatway will respond appropriately to reports of missing and absent persons. Every report will be risk assessed so that those who are vulnerable or represent a high risk will be immediately identified. This process shall be on-going, dynamic and supervised in each and every case with a focus on locating the person safely and mitigating any risk posed to others. Where criminality is associated with either the initial disappearance or subsequent harbouring of those who wish to remain absent, this will be reported to the police.

Greatway will liaise closely with schools following a report that a student has gone missing.

Greatway is aware that some schools may wish to take the lead in the response as they retain the overall duty of care as the student's sponsor. In these cases, **Greatway** will cooperate fully with the school's requests. The procedure outlined in this policy assumes that the guardianship organisation is taking the lead in the response.

Definitions:

Greatway adopts distinct definitions to determine whether someone is missing or absent is in accordance with the National Police Chiefs Council definitions (issued by ACPO in 2013).

The following definitions are included within the Local Safeguarding Children Partnership protocols:

Absent – a child or young person is not at a place where they are expected or required to be and there is no apparent risk.

Missing – a child or young person whose whereabouts cannot be established and where the circumstances are out of character, or the context suggests the person may be subject of crime or at risk of harm to themselves or another.

Supporting Reference Documents:

NSPCC publications

Working Together to Safeguard Children 2023

Safeguarding Children and Young People from CSE 2009

Scoping Report on Missing and Abducted Children – CEOP

Local Safeguarding Children Partnership Protocols – Reporting children who go missing from care

Statutory Guidance on children who run away or go missing from home or care – DfE 2014

Children Missing Education: <https://www.gov.uk/government/publications/children-missing-education/children-missing-education-statutory-guidance-for-local-authorities-and-schools>

Procedure:

This workflow applies when a young person is absent (they are not where they are supposed to be but there is no apparent risk) or when they are missing (unexpected and uncharacteristic absence which causes concern for their safety). It applies when they are under the care of **Greatway** during journeys around the UK organised by us or at a homestay.

The DSL Mitzi Powles or Deputy DSL Stephanie (Yingxia) Zhang shall manage any cases of absent or missing children or young people, and as such all reports must be brought to the attention of the DSL or Deputy DSL.

Contact details for the DSL and DDSL

Job title	Name	Telephone/ Email
DSL	Mitzi Powles	Telephone: +44 (0)142 250393 mitzi@Greatwayeducation.com
DDSL	Stephanie (Yingxia) Zhang	Telephone: +44 (0)142 250393 Email: stephanie@Greatwayeducation.com
Greatway 24-hour emergency number (out of hours)	Stephanie (Yingxia) Zhang	Telephone: +44 (0)7539428055 Email: stephanie@Greatwayeducation.com

If a child or young person goes missing out of hours and **Greatway** receives a report then the on duty manager is responsible for ensuring the completion of the initial reasonable enquiries where a student is absent/missing during an event (for example half term, exeat or during a suspension/expulsion) which will include:

- if appropriate, reviewing the flight and transfer details (with communication to the airline and transfer company to confirm transport arrangements for the student)

- texting, emailing and phoning the student (leaving a message if no answer) asking them to make contact with the on duty member of staff and repeating this contact every 30 minutes
- texting, emailing and phoning the house parent to collate any relevant information about the whereabouts of the student – this is only possible if the houseparent is at school.
- texting, emailing and phoning the parent/agent to collate any relevant information about the whereabouts of the student
- texting, emailing and phoning the homestay to collate any relevant information about the whereabouts of the student
- review of information held on file which may indicate friends or associates who the student may be with.

Any member of staff or homestay may report a child or young person as absent or missing to the police where they have genuine concerns for their safety.

Following a risk assessment, the receiving police force will record a report of absent or missing where there are grounds to do so. In cases of missing children or young people, the police will work cooperatively with Children’s Social Care staff during any enquiry.

The incident lead is responsible for ensuring the school is informed of any report made to the police of an absent or missing child or young person, as the school retains the overall duty of care. The school should be updated with any developments as they should know the whereabouts of the student at all times, especially those on visas. [The school may decide to take the lead in the incident and will have their own missing child procedure. Where this is the case, the guardianship organisation should take direction from the member of school staff leading the response.]

The incident lead is responsible for ensuring that the parents/agent are informed of any report made to the police of an absent or missing child or young person. The parents/agent should be regularly updated (recommended a minimum of every 4 hours) with any developments. This is to ensure that they are fully informed as to the situation involving their son or daughter.

All missing person reports are to be reviewed by the Director – Stephanie Zhang as soon as practicable with subsequent on-going daily review until the incident is resolved.

Process and Response – report of a missing child

1. A child or young person who falls into the ‘Missing’ Category must be reported to the police as soon as possible by telephoning 101 for a non-emergency report or 999 for an emergency response i.e. information received that a child or young person is in immediate danger of harm.

YOU WILL NEED TO ENSURE THAT YOU ARE TRANSFERRED TO THE FORCE RELEVANT TO THE AREA THE CHILD IS MISSING/ABSENT FROM.

IF CALLING 999 YOU WILL NEED TO TELL THE CALL HANDLER TO STAY ON THE LINE WHILE YOU ARE TRANSFERRED TO THE RELEVANT FORCE.

If the report to the police is not made by the DSL/ DDSL, then the reporter must inform the DSL/ DDSL of the situation as soon as possible.

2. The DSL or Deputy DSL will ensure that the following information is gathered for the initial report to the police:

- Name, date of birth and nationality of the child or young person;
- The specific concern for the child or young person;
- Whether they are likely to be subjected to crime, a victim of abuse or at risk of sexual exploitation;
- Whether the child or young person is likely to attempt suicide;
- Whether the child or young person is likely to pose a danger to other people;
- What actions have been completed so far to locate the child or young person;
- A description of the child or young person, including their build, hair, clothing and glasses;
- Details of when the child or young person was last seen and with whom;
- Personal details of the child or young person (including any medical conditions or ailments);
- Any previous history of absconding/absenteeism and circumstances of where found;
- The circumstances under which the child or young person is absent;
- Any factors which increase the risk to the child or young person;
- Homestay address.

Information that may be needed later to extend investigations if the young person is not located:

- A recent photograph (if available);
- Family addresses and contact telephone numbers;
- Known associates, telephone numbers and addresses frequented;
- The names and addresses of the child or young person's GP and dentist;
- The circumstances under which the child or young person is absent;
- Any factors which increase the risk to the child or young person;
- School and House Parent addresses and contact details;
- Details of any travel and accommodation plans authorised by the overseas parents;
- Details of any social media accounts that may be open to the public.

3. The incident must be recorded as an incident report file with regular updates being added until the matter has been resolved. If a police report has been made, the police incident reference number must be recorded. A record of all emails should be included in the incident report file.

4. Following the report to the police, the parents, the agent (if applicable), school and homestay must be informed and requested to contact the Director – Stephanie Zhang without delay if the child or young person makes contact.

Process and Response – report of an absent child

1. If a child or young person is considered to fall within the definition of absent, the decision to record the child as such, together with the evidence supporting that decision must be recorded. The

absence of a child or young person must be recorded in the Student File as an 'incident'.

2. Details of children or young people who are absent should still be notified to the police (using the non-emergency telephone number 101 or the emergency telephone number 999) in order that a record of the child or young person's absence can be made, an agreement can be reached on what needs to be done, review times and on-going actions. Although there is an expectation that **Greatway** should continue to make reasonable enquiries to locate the child or young person, the police may also initiate some enquiries as appropriate.

3. The Incident Lead or **Greatway** Director – Stephanie Zhang will notify the school and parents/agent of the incident and regularly provide updates to both parties (minimum every 4 hours) with news of any developments, or confirmation that there have been no developments since the last update. This also affords an opportunity for the school or parents/agent to update the Incident Lead or **Greatway** Director – Stephanie Zhang with any contact they may have had from the student or other information received. All updates provided to the school and parents/agent must be recorded in the incident record.

4. **Greatway** staff will constantly review the circumstances in the light of any enquiries made or information received and inform the police of any developments by telephoning 101, quoting the reference number and providing the new information received. If the period of absence continues for six hours, consideration should be given as to whether the child should still be regarded as absent, or whether they should now be considered as missing. Six hours should be regarded as the maximum period before reconsideration, and in many cases a shorter period would be more appropriate.

5. Any case of an absent child or young person which causes significant concern, or gives rise to the suspicion of harm, should be brought to the attention of the Designated or Deputy Safeguarding Leads without delay and should be reviewed with a view to the possibility that this is a missing child or young person.

Informing the media

The Police are responsible for advising the media regarding children or young people who are reported as missing. The decision to publicise these matters will always be made in consultation with the parents who have to give their signed consent before the media are able to circulate the details. As such, no member of **Greatway** should release any details to the media and must refer any contact from them directly to the relevant force's Media Relations Office.

The Return

1. The police are responsible for ensuring that the child or young person reported missing has returned safe and well and has an opportunity to disclose any relevant issues in the return interview.
2. Where a child or young person has been reported as absent to the police, they will not be given a return interview. In such cases, a **Greatway** member of staff will conduct the return interview to allow the child or young person an opportunity to talk to someone about their absence.
3. Where an allegation of any form of child abuse is made or becomes evident, child protection procedures must be implemented, and immediate contact must be made with the police child protection team and the Local Authority Child Protection Service where the child is living.

4. If there is any suggestion that the child has been a victim or perpetrator of crime, consideration must be given to securing evidence by police including by forensic examination. This should also include securing clothing and delaying washing/bathing in relevant cases. Staff must remember that all necessary permissions must be obtained from the child or young person's parents and/or those with parental responsibility. The priority is to recognise that the welfare of the child or young person is paramount, and careful consideration must be given to the potential effects of such procedures on the child or young person.

5. Any persons informed of the child or young person's absence should be advised of the child or young person's return without delay including the school and parent/agent.

6. For a child or young person who has been reported as absent or missing on two or more occasions, **Greatway** will decide in consultation with others, whether a formal review of the guardianship is required.

Children who are absent from education

As explained in *Keeping Children Safe in Education*, all staff and homestays should be aware that children going missing from education, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so-called 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Should **Greatway** become aware that a student in their care is missing from education, they will notify the school or college that the student attends immediately.

Children Missing Education (2025) is statutory guidance that sets out key principles to enable local authorities in England to implement their legal duty under section 436A of the Education Act 1996 to make arrangements to identify, as far as it is possible to do so, children missing education (CME).

Children Missing Education explains that:

'Children missing education (CME) are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school.'

'Regardless of their circumstances, the law entitles every child of compulsory school age to an efficient, full-time education which is suitable to their:

- age
- ability
- aptitude
- any special educational needs they may have

This may include suitable education through regular attendance at school, alternative provision or otherwise (for example, EHE).

CME are at significant risk of underachieving, having poorer health outcomes, being victims of harm, exploitation or radicalisation, and becoming not in education, employment or training (NEET) later in life.

No single individual at a school, local authority or related service 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 them has a role to play in identifying concerns, sharing information and taking prompt action to help in the identification and support of CME.

Safeguarding and promoting the welfare of children is everyone's responsibility. In order to fulfil this responsibility effectively, all individuals involved in identifying and supporting CME should make sure their approach is child centred.'

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 12.01.2026

Signed:



Date: 12.01.2026

Greatway Guardianship and Educational Services Safer Recruitment Policy

Policy Statement

Greatway is committed to safeguarding and promoting the welfare of children and young people at all times while they are under our care.

Greatway adhere to the principles of the statutory 'Safer Recruitment' guidance for schools, and the National Society for the Prevention of Cruelty to Children (NSPCC) 'Safer Recruitment' advice.

Greatway follow the Association for the Education and Guardianship of International Students (AEGIS) guidelines as part of an on-going accreditation process. This is to ensure our students receive the highest standards of homestay and care while under our guardianship.

Greatway is aware of additional sources of advice and guidance for the standards required for homestay recruitment including the British Council (Homestay guidelines and Codes of Practice), and the Department for Education Boarding Schools National Minimum Standards (September 2022).

This policy is supported by the most recent version of '*Keeping Children Safe in Education*' part three. **Greatway** have a rigorous process for recruiting staff and homestays in accordance with the principles of 'Safer Recruitment'. This is from point of advertisement to post induction, with on-going monitoring and safeguarding reviews.

The Safer Recruitment policy aims to help to deter, reject, or identify people who might abuse children, or are otherwise unsuited to work with them. At every stage of the process, **Greatway's** commitment to safeguarding and promoting the welfare of children is highlighted.

Aims of the policy

The aims of the policy are:

- To ensure that **Greatway** meets the commitment to safeguarding and promoting the welfare of children and young people, by carrying out all necessary pre-employment checks as part of the Safer Recruitment process
- To ensure that the best possible members of staff and homestays are recruited on their abilities and suitability for the advertised role in line with relevant legislation, recommendations and guidance

- To ensure that no applicant is treated unfairly on any grounds including race, colour, nationality, ethnicity or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age. The recruitment and selection process will ensure the identification of the person best suited to the advertised role based on the applicant's abilities, qualifications, experience and merit as measured against the job description and person specification. If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

Recruitment procedure for staff

Advertising a role

Greatway plan the recruitment exercise to ensure that the recruitment panel are clear about the qualities, qualifications and experience needed by the successful candidate and whether there are any particular matters that need to be mentioned in the advertisement for the post. This is in order to prevent unwanted applications or ultimately an unsuitable appointment.

The job and person specification for each role form part of the pack sent to prospective candidates and set out the extent that the role involves working with children and young people, and the safeguarding responsibility involved.

Advertisements for roles make **Greatway's** commitment to safeguarding clear by including the following statement: "**Greatway** is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share in this commitment". There should also be reference to the responsibility for safeguarding and promoting the welfare of children in the job description.

Greatway's advertisements also include the requirement for each applicant obtaining an enhanced Disclosure and Barring Service check from original identification documents and, where relevant, documents to prove their right to work in the UK. The advertisements also include details of the post, payments and qualities required to fulfil the role.

Greatway do not accept curriculum vitae (CV) drawn up by the applicant without an accompanying application form being submitted. This is because a CV presents only the information the applicant wishes to present and may omit relevant details. The application form details the safeguarding mission statement, the requirement for an applicant to have an enhanced DBS and for references to be sought prior to interview where possible. Completed application forms and accompanying CV's are stored securely on a confidential computer drive by the Administrator.

The Administrator maintains the bank of job adverts securely and confidentially. The details are circulated via online advertising organisations which require applicants to submit expressions of interest together with their CV to the company.

The Application Form

On receipt of expressions of interest and accompanying CVs, the DSL will screen initial submissions, and the application form will be sent to applicants who have the potential to meet the requirements of the job specification and person specification.

Through the application form, **Greatway** obtains the following information:

- full identifying details of the applicant including current and former names, date of birth, current address and National Insurance number;
- a statement of any academic and/or vocational qualifications that the applicant has obtained, relevant to the position for which s/he is applying, with details of the awarding body and date of award;
- a full history, in chronological order, since leaving secondary education, including periods of any post-secondary education/training, part-time and voluntary work as well as full time employment, with start and end dates along with explanations for periods not in employment, education or training and reasons for leaving employment;
- a declaration of any family or close relationship to existing employees or employers;
- details of referees. One referee should be the applicant's current or most recent employer. Normally, two referees should be sufficient. N.B. Where an applicant who is not currently working with children has done so in the past it is important that a reference is also obtained from the employer by whom the person was most recently employed with regard to their work with children. The form makes it clear that references will not be accepted from relatives or from people writing solely in the capacity of friends, and that references may be sought from previous employers on short listed candidates for information to verify particular experience or qualifications, before interview; and
- a statement of the personal qualities and experience that the applicant believes are relevant to his/her suitability for the post advertised and how s/he meets the person specification.

Where a role involves engaging in regulated activity relevant to children **Greatway** will make applicants aware on the application form that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

There will be a self-disclosure process introduced for short listed candidates to ensure the applicant has an opportunity to raise all information in a confidential way. Only shortlisted applicants will be asked to provide any information about unspent and unprotected criminal records. Short listed applicants will be asked to declare that they are not disqualified from working with children through the Disclosure and Barring Service's (DBS) Barring Lists, or subject to sanctions imposed by a regulatory

or professional body, and have no convictions, cautions or bind overs. Any disclosures can be discussed with them prior to or at interview (pending receipt of the completed enhanced DBS check).

If the applicant is currently working with children, on either a paid or voluntary basis, their current employer with children will be asked about disciplinary offences relating to children, including any in which the penalty is time-expired (that is where a warning could no longer be taken into account in any new disciplinary hearing for example) and whether the applicant has been the subject of any child protection concerns and, if so, the outcome of any enquiry or disciplinary procedure. If the applicant is not currently working with children but has done so in the past, that previous employer will be asked about those issues.

Providing false information may be an offence and could result in the application being rejected or summary dismissal if the applicant has been selected and possible referral to the police.

The Job Description and Person Specification

Once a post becomes vacant, or a new post is created, the DSL will review the job description to ensure compliance with the Safer Recruitment guidance.

The job description will state the main duties and responsibilities of the post; and the individual's responsibility for promoting and safeguarding the welfare of children s/he is responsible for or comes into contact with. The extent of this responsibility will vary according to the nature of the post being advertised.

The Person Specification

The Person Specification is supplementary information to the job description and lists essential and desirable criteria for the post, including experience, competencies and qualities that the successful candidate should be able to demonstrate. The Person Specification will explain how these requirements will be tested and assessed during the selection process. This document will be reviewed by the DSL to ensure compliance with the Safer Recruitment guidance.

The Person Specification will explain that the interview will explore issues relating to safeguarding and promoting the welfare of children including:

- motivation to work with children;
- ability to form and maintain appropriate relationships and personal boundaries with children;
- emotional resilience in working with challenging behaviours; and
- explain that if the applicant is short-listed any relevant issues arising from his/her references will be taken up at interview.

The Application Information Pack

In addition to the application form, an information pack is sent to applicants. The pack will contain:

- The application form
- The job description and person specification
- Requirement to complete an enhanced DBS Disclosure
- **Greatway** will seek references and may approach previous employers for information and verification of experience or qualifications
- Safeguarding and Child Protection Policy statement
- A statement of the terms and conditions relating to the post
- Information about the applicant's current employer being contacted and asked about any disciplinary offences or relevant information relating to children, where the applicant is currently working with children on a paid or voluntary basis (including expired offences).

Scrutinising and shortlisting applications

Two members of staff are responsible for scrutinising applications and short-listing candidates. At least one member of the panel is Safer Recruitment trained.

All applications are checked to ensure they are fully and properly completed, that the information is consistent, does not contain any discrepancies and to ensure that any gaps in employment are identified.

As per the Safer Recruitment guidance, incomplete application forms will not be accepted and will be returned to the applicant for completion.

Any gaps in employment will be noted and considered during the short-listing process. In addition, reasons for any repeated changes of employment without a clear career or salary progression, or a mid-career move from a permanent post to supply teaching or temporary work will also be explored and verified.

All applicants will be assessed equally against the criteria contained in the person specification without exception or variation and without unlawful discrimination.

Shortlisted candidates will be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records; further information can be found on GOV.UK. **Greatway** will ask staff to complete a self-declaration on an annual basis thereafter to ensure that the information remains up to date. Should the circumstances of any member of staff change in the meantime, it is their responsibility to inform the guardianship organisation immediately.

All shortlisted candidates will be informed that online searches will be undertaken.

A copy of the interview form is kept on the personnel file.

Online Search

Greatway will carry out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. All shortlisted candidates will be informed that online searches will be undertaken.

References

Greatway seek references for each application to obtain objective and factual information to support appointment decisions. References will always be sought and obtained directly from the referee with comments requested on work, professional competence and personal qualities. In the case of a potential member of staff, references will be requested from the candidate's current employer if an applicant is currently employed. References will always be obtained in writing.

Referees are asked to comment on the applicant's suitability to work with children, to outline any concerns about the applicant working with children or any disciplinary details.

'To whom it may concern' references are not accepted by **Greatway** to reduce the risk of making an appointment decision on a forged reference.

Where (due to operational need) a reference is secured over the telephone in the first instance a record must be made of the telephone reference. Following this initial record, the reference will be obtained in writing as soon as practicable to provide a record of the information obtained from the referee.

Where electronic references are received, **Greatway** will ensure they originate from a legitimate source.

Once the references have been received, **Greatway** will verify the source of the reference. If concerns are raised within the reference, **Greatway** will address these by telephoning the referee, providing an opportunity for **Greatway** to ask any further questions where required. A log of the call will be placed on file. The references will be retained on file for the duration of contract/employment and then an agreed period afterward, normally 5 -7 years.

Greatway is required to check that information provided in references is not contradictory or incomplete. On receipt, references will be checked to ensure that all specific questions have been answered satisfactorily. The referee will be contacted to provide further clarification as appropriate, for example if the answers are vague or if insufficient information is provided. They will also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies will be taken up with the candidate.

Any offer of employment will always be conditional on the receipt of satisfactory references.

Invitation to interview

In addition to the arrangements for interviews – time and place, directions to the venue, membership of the interview panel – the invitation will remind candidates about how the interview will be conducted and the areas it will explore including suitability to work with children. Enclosing a copy of the person specification can usefully draw attention to the relevant information.

The invitation will also stress that the identity of the successful candidate will need to be checked thoroughly to ensure the person is who he or she claims to be, and that where an enhanced DBS Disclosure is appropriate the person will be required to complete an application for a DBS Disclosure straight away. Consequently, all candidates will be instructed to bring with them documentary evidence of their identity that will satisfy the requirements when applying for an enhanced DBS i.e. either a current driving licence or passport including a photograph, or a full birth certificate, plus a recent document (within the last three months) such as a utility bill or financial statement that shows the candidate's current name and address and where appropriate change of name documentation. In addition, where the candidate needs permission to work in the UK, they must produce this documentation at the interview for checking and verification.

Candidates will also be asked to bring documents confirming any educational and professional qualifications that are necessary or relevant for the post, e.g. the original or a certified copy of a certificate, or diploma, or a letter of confirmation from the awarding body. If the successful candidate cannot produce original documents or certified copies, written confirmation of his or her relevant qualifications will be obtained from the awarding body.

A copy of the documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file.

Wherever possible, **Greatway** will obtain references for short-listed candidates prior to the interview. If candidates ask that references are not sought prior to interview, any provisional offer of employment will be subject to satisfactory references being obtained.

Interviews

The interview will be conducted by at least two people who will have met before the interview to agree the required standard for the role, consider the issues to be explored with each candidate and how the interview will be conducted. At least one of the two people on the interview panel must be Safer Recruitment trained.

Two interviewers allow for one interviewer to observe and assess the candidate while the other interviewer makes notes using the pre-planned competency-based question set. This reduces the possibility of any dispute about what was said or asked during the interview.

The panel will agree the questions they will ask candidates during the interview, the issues that may have been identified in the application form and references that may need exploring. This will include:

- the candidate's attitude toward children;
- their ability to support the organisation's agenda for safeguarding and promoting the welfare of children;
- gaps in the candidate's employment history;
- concerns or discrepancies arising from the information provided by the candidate and/or a reference; and
- the panel will also ask the candidate if they wish to declare anything in light of the requirement for an enhanced DBS check.

The panel will record the interview on the **Greatway** Interview Form.

If, for whatever reason, references are not obtained before the interview, the candidate will also be asked at interview if there is anything they wish to declare or discuss in light of the questions that have been (or will be) put to their referees. It is vital that the references are obtained and scrutinised before a person's appointment is confirmed and before they start work.

The interview process will ask the candidate to produce original documentation of any educational or professional qualifications that are necessary or relevant to the post. If the candidate is not able to produce the certificates, written confirmation of his or her relevant qualifications must be obtained from the awarding body.

A copy of the documents used to verify the candidate's identity, right to work in the UK and qualifications must be kept for the personnel file. These will be checked, signed and dated by the verifier. Confirmation that these documents have been inspected will be recorded on the Single Central Record.

A copy of the interview form is kept on the personnel file.

Conditional Offer of Appointment

The appointment of the successful candidate will be conditional upon the receipt of at least two satisfactory references (for further details see information above), proof of identification, proof of right to work in the UK (if appropriate), an enhanced DBS check, verification of qualifications where they are a requirement of the post and the completion of any probationary period.

Greatway will follow relevant DBS guidance if a check reveals information that a candidate has not disclosed in the course of the selection process. Enhanced DBS checks will always be followed up where the results are unsatisfactory or there are discrepancies in the information provided.

Where the candidate is found to be disqualified from working with children by a court; or an applicant has provided false information in, or in support of, his or her application; or there are serious concerns about an applicant's suitability to work with children, the facts must be reported to the relevant authorities, such as the DBS or the Police by the DSL.

Further details on Pre-Appointment Vetting Checks Greatway undertakes

All offers of appointment are conditional until satisfactory completion of the mandatory pre-employment checks. **Greatway** will:

- verify a candidate's identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the GOV.UK website.
- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children). When using the DBS update service **Greatway** will still need to view the original physical certificate. Original physical certificates must be seen by the guardianship organisation before a candidate commences work. A record of the certificate date, type and number will be retained and recorded on the single central record of appointments. Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. **Greatway** complies with the requirements of the Data Protection Act 2018. We will only retain a copy of a DBS, where there is a valid reason for doing so and it will not be kept for longer than six months.
- verify the candidate's mental and physical fitness to carry out their work responsibilities. *Keeping Children Safe in Education* explains that a job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role.
- verify that any member of staff acting as an educational guardian holds British citizenship or settled status.
- **Greatway** will check whether the member of staff acting as an educational guardian:
 - has been convicted of a criminal offence in the UK or overseas for which they have received a custodial sentence of 12 months or more
 - is a persistent offender who shows a particular disregard for the law
 - has committed a criminal offence, or offences, which caused serious harm

If any of these apply, **Greatway** will be unable to appoint the member of staff.

Greatway will consider refusing the appointment of an educational guardian where the individual:

- has been convicted of a criminal offence in the UK or overseas for which they have received a custodial sentence of less than 12 months
 - has been convicted of a criminal offence in the UK or overseas for which they have received a non-custodial sentence or received an out-of-court disposal that is recorded on their criminal record.
-
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, **Greatway** will follow the advice on the GOV.UK website.
 - if the person has lived or worked outside the UK, make any further checks the guardianship organisations consider appropriate and,
 - verify professional qualifications, as appropriate.
 - ask short listed candidates to complete a self-declaration. Only shortlisted applicants will be asked to provide any information about unspent and unprotected criminal records.

Post Appointment: Induction

Newly appointed staff members must have an induction programme to complete, regardless of previous experience. The induction programme includes policy and procedure training, details of the support available for individuals in their new role, confirmation of agreement to abide by the Staff Code of Conduct and provides opportunities for new staff members to discuss any issues or concerns through 1:1 meetings with their line manager.

The content and nature of the induction will vary according to the role and previous experience of the new member of staff, however, it will always include the safeguarding policy, safeguarding response to children who go missing from education, behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying), staff and homestay code of conduct, how to report concerns, low level concerns policy, whistle-blowing policy and with whom they should discuss any concerns about their role or responsibilities. The induction programme will contain child protection training. All staff who work directly with children will be asked to read *Keeping Children Safe in Education* Part One. Those who do not work directly with children will be asked to read *Keeping Children Safe in Education* Annex A.

The line manager of the newly appointed staff member will report any concerns or issues about a person's ability or suitability for the role at the outset and address these immediately.

Maintaining a safer culture

Greatway recognises the need for continued awareness of safeguarding issues. Staff receive appropriate training and induction to ensure that they understand their roles and responsibilities and are confident in carrying them out. Staff receive regular safeguarding and child protection updates from the DSL – Mitzi Powles. Staff, parents, students and partners are encouraged to report any issues or concerns about the safety or welfare of children, and that they will be listened to and taken seriously.

Recruitment procedure for Homestays

Planning and Advertising

The homestay advertisement (which includes our mission statement, specific reference to safeguarding and suitability to work with children) is circulated in accordance with homestay targets in areas of need via online advertising agents such as Google PPC campaigns and print publications to identify the suitable homestay candidates in appropriate areas.

Application Form and Application Pack

The homestay responds to the advertisement by completing an online application form. Applicants must be over 25 years of age and be suitable to work with children.

On receipt of the enquiry form the homestay applicant is sent log in details to the online application form which obtains relevant details for the role.

Where a role involves engaging in regulated activity relevant to children **Greatway** will make applicants aware on the application form that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

Instructions on the form include explanatory notes about completing the form, links to the job description and person specification, **Greatway** Safeguarding and Child Protection Policy and a statement of the terms and conditions relating to the post.

The Application Form outlines the requirement for the applicants (including members of the homestay aged 16 and over and all other temporary residents) to complete an enhanced Disclosure (including children's barred list information, for those who will be engaging in regulated activity with children). The applicant will be required to provide evidence (i.e. original documents) of their identification to the staff interviewer during the initial inspection for verification.

Enhanced DBS checks are required for all members of the homestay aged 16 and over and any individual who stays regularly with the homestay. If any family members are studying at university but come back during the holidays when students will be hosted, then they will also need a DBS check.

The application form will explain how **Greatway** may contact the Local Authority to check if they know of any reason why the candidate may be unsuitable to host children.

The application form will explain how the primary carer in the homestay will be required to complete a declaration on behalf of the household that provides information on their suitability to work with children. Alternatively, each household member could complete an individual self-declaration. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records, further information can be found on GOV.UK

The Job Description and Person Specification

Once a post becomes vacant or a new post is created, the DSL will review the job description to ensure compliance with the Safer Recruitment guidance and confirmation that the main duties and responsibilities are outlined. This will include the responsibility for safeguarding the students that the homestay is responsible for.

The Person Specification is supplementary information to the job description and lists essential and desirable criteria (for example qualifications, experience, competences and qualities) for the post. This document will be reviewed by the DSL to ensure compliance with the Safer Recruitment guidance.

Scrutinising and short listing

When the application form is submitted, the Director – Stephanie Zhang scrutinises the form to ensure it is fully and properly completed, applicants are in the right homestay area for the students and are suitable for the initial inspection and interview stage.

All candidates are assessed equally against the criteria contained in the person specification without exception or variation and without unlawful discrimination.

There is a disclosure process for short listed candidates to ensure the applicant has an opportunity to raise all information in a confidential way. Disclosure forms are completed by the primary carer on behalf of the whole homestay (aged 16 and over). Only shortlisted applicants will be asked to provide any information about unspent and unprotected criminal records. Short listed applicants will be asked to declare that they are not disqualified from working with children through the Disclosure and Barring Service's (DBS) Barring Lists, or subject to sanctions imposed by a regulatory or professional body, and have no convictions, cautions or bind overs. Any disclosures can be discussed with them prior to or at interview (pending receipt of the completed enhanced DBS check). **Greatway** will ask homestays to complete declaration forms on an annual basis to ensure that information remains up to date. Should the circumstances of any member of the homestay change in the meantime, it is the homestays' responsibility to inform the guardianship organisation immediately.

All shortlisted candidates will be informed that online searches will be undertaken.

Online Search

Greatway will carry out an online search as part of their due diligence on potential homestays. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview. All potential homestays will be informed that online searches may be undertaken.

References

Homestay references for the primary carer/s are requested prior to interview. This is to obtain

objective and factual information to support appointment decisions. As a minimum, one personal and one professional reference must be obtained for each primary carer, or one professional reference for each primary carer with one joint personal reference. The homestay must provide written permission to confirm these references can be sought. References will always be obtained in writing.

When the application form is submitted the applicant must nominate referees who they have known in a professional and personal capacity, with the personal referee having known the applicant for a minimum of two years.

Referees are asked to comment on work, professional competence and personal qualities. Referees are asked to comment on the applicant's suitability to work with children, to outline any concerns about the applicant working with children or any disciplinary details.

References which are submitted online are reviewed to ensure we have obtained independent professional and character references that answer specific questions. This helps to assess an applicant's suitability to work with children and follow up any concerns.

'To whom it may concern' references are not accepted by **Greatway** to reduce the risk of making an appointment decision on a forged reference.

Where (due to operational need) a reference is secured over the telephone in the first instance a record must be made of the telephone reference. Following this initial record, the reference will be obtained in writing as soon as practicable to provide a record of the information obtained from the referee.

Where electronic references are received, **Greatway** will ensure they originate from a legitimate source.

Once the references have been received, **Greatway** will verify the information given in the reference. If concerns are raised within the reference, **Greatway** will address these by telephoning the referee, providing an opportunity for **Greatway** to ask any further questions where required. A log of the call will be placed on file. The references will be retained on file for the duration of contract/employment and then an agreed period afterward, normally 5 -7 years.

Greatway is required to check that information provided in references is not contradictory or incomplete. On receipt, references will be checked to ensure that all specific questions have been answered satisfactorily. The referee will be contacted to provide further clarification as appropriate, for example if the answers are vague or if insufficient information is provided. They will also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies will be taken up with the candidate.

Any offer of employment will always be conditional on the receipt of satisfactory references.

Interviews and initial visits

For applicants who are short listed, the Director – Stephanie Zhang will arrange the initial visit. The invitation for the initial visit and interview will stress that the successful candidate will need to be checked thoroughly in terms of identification and the completion of an enhanced DBS check. This

will require the candidate to provide to the interviewer documentary evidence of their identity (for example current driving licence, passport, full birth certificate, plus documents for example a recent utility bill or financial statement that shows the candidate's full name and address). Where a candidate has changed their name, full documentation must be provided detailing the previous name and current name.

The homestay applicant is advised and given instructions on how to prepare for the identification and enhanced Disclosure and Barring Service Check during the visit.

During the initial visit, the staff member interviews the applicants face to face to confirm suitability for the role and suitability to work with children.

The staff interviewer inspects the house, garden and any car which will be used to transport students and secures photographs of the property (including individual rooms).

The staff interviewer is encouraged to discuss the homestay's previous employment history and experience, and to note any indications that the primary carers may not have the health and/or physical capacity for the role, together with the applicant's right to work in the UK where appropriate. The interviewer must check and verify the documents used to verify an applicant's identity, right to work in the UK and/or qualifications (where appropriate), as per the instructions on U Check. Permission is sought to retain a copy of the documents used to verify homestay identity, right to work and required qualifications. These will be kept on the personnel file.

The staff interviewer will keep a written record of the interview, and these will be stored in the homestay personnel file.

Scope of the interview

The interviewer will assess and evaluate the applicant's suitability for being a **Greatway** homestay, their motivation for working with children and young people, and their ability to support the company aims and principles. There is scope on the visit form to record this detail which will be submitted to Head Office for assessment.

The interviewer is encouraged to ask the applicants aged 16 or over in the homestay if they wish to declare anything in light of the requirement for an Enhanced DBS disclosure.

Where references have not been returned to Head Office before an interview, the prospective homestay can be asked at interview if there is anything they wish to declare or discuss in light of the questions that have been or will be put to their referees.

Conditional Offer of Appointment and DBS Checks

The successful applicants will be conditionally accepted pending references, proof of identification, proof of right to work in the UK (if appropriate), an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children), verification of qualifications where they are a requirement of the post and the completion of any probationary period.

As part of the vetting process, **Greatway** may contact the Local Authority to check if they know of any reason why the candidate may be unsuitable to host children. We make all candidates aware of this on our application form.

Further details on Pre-Appointment Vetting Checks Greatway undertakes

All offers of appointment are conditional until satisfactory completion of the mandatory pre-employment checks. **Greatway** will:

- verify a candidate's identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the GOV.UK website.

- obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children). When using the DBS update service **Greatway** will still need to view the original physical certificate. Original physical certificates must be seen by the guardianship organisation before a candidate commences work. A record of the certificate date, type and number will be retained and recorded on the single central record of appointments. Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. **Greatway** complies with the requirements of the Data Protection Act 2018. We will only retain a copy of a DBS, where there is a valid reason for doing so and it will not be kept for longer than six months.

- verify the candidate's mental and physical fitness to carry out their work responsibilities. *Keeping Children Safe in Education* explains that a job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;

- verify that the homestay holds British citizenship or settled status.

- **Greatway** will check whether the intended homestay primary carer, or anyone regularly living with the intended nominated homestay:
 - has been convicted of a criminal offence in the UK or overseas for which they have received a custodial sentence of 12 months or more
 - is a persistent offender who shows a particular disregard for the law
 - has committed a criminal offence, or offences, which caused serious harm

If any of these apply, **Greatway** will be unable to appoint the homestay.

Greatway will consider refusing the appointment of a homestay where the homestay primary carer or anyone regularly living in the homestay home:

- has been convicted of a criminal offence in the UK or overseas for which they have received a custodial sentence of less than 12 months
 - has been convicted of a criminal offence in the UK or overseas for which they have received a non-custodial sentence or received an out-of-court disposal that is recorded on their criminal record.
-
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, **Greatway** will follow the advice on the GOV.UK website;
 - an overseas check will be undertaken if a member of staff, volunteer or homestay member has lived or worked abroad for more than 3 months in the last five years.; and,
 - verify professional qualifications, as appropriate.

Post Appointment: Induction

Newly appointed homestays are provided with a Homestay Handbook which contains guidance and advice for the role of homestay. The Safeguarding and Child Protection Policy is also made available to the homestay, as is Child Protection Training.

Homestays have on-going support from Stephanie Zhang – Director and Kat Gielkens- inlingua coordinator, regardless of their experience of the homestay role.

Post Appointment: On-going training and monitoring

Greatway homestays receive regular emails or WhatsApp messages containing updates and safeguarding news. This is to ensure that guidance is regularly circulated and homestays have continual access to Safeguarding Training and regular NSPCC Safeguarding and Child Protection updates.

The homestay's initial visits and annual revisit process provides **Greatway** with the infrastructure to continually monitor the quality of homestays. These visits check that the highest standards are afforded to our students. Written records of annual visits will be stored in the homestay personnel file.

Homestays must inform **Greatway** of any changes to their circumstances. This includes changes to DBS status and any changes to who is living in the household (whether members have moved in or out).

Further information about temporary visitors/ other students

Homestays are required to inform us in advance when they have a temporary overnight visitor staying at the same time as hosting one of our students.

Where there is an overseas student staying with a UK homestay via a private arrangement or through another Guardianship Organisation, an enhanced DBS check will not be required, although homestays must inform us that they are hosting additional students.

Monitoring and Review

Monitoring of both the recruitment process and induction arrangements will allow for future recruitment practices to be better informed.

The reviews will cover:

- staff turnover and reasons for leaving;
- exit interviews;
- attendance of new recruits at child protection training.

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 12th January, 2026

Signed:



Date:

12.01.2026



Greatway Guardianship & Educational Services Data Protection Policy

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1. Introduction and purpose

This policy outlines our approach to handling personal information in accordance with the UK General Data Protection Regulation 2016 and the Data Protection Act 2018.

For the purposes of this policy, **Greatway** is the data controller.

The purpose of this Policy is to explain how we handle personal information under the relevant data protection laws, and to inform employees and other individuals who process personal information on our behalf, of our expectations in relation to this.

2. Scope

This policy applies to the processing of personal information that is held by **Greatway**. This includes personal information about employees, volunteers, parents, students, homestays, visitors, and any other individuals who engage with us.

This policy should be read in conjunction with the **Greatway** Privacy Policy.

3. Definitions

The following terms are used throughout this policy and it is important that you understand what they mean:

- **Personal data:** Any information relating to a person who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.
- **Data subject:** the identified or identifiable living individual to whom personal data relates
- **Controller:** A person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Processor:** A person or organisation which processes personal data on behalf of the controller, and in accordance with their instructions.
- **Processing:** This is anything that you do with data, including collecting, recording, storing, using, analysing, combining, disclosing, or deleting it.

- **Special category data:** This is personal data that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. It also includes genetic data, biometric data, and data concerning a person's health, their sex life, and sexual orientation.

4. Roles and responsibilities

Greatway is the data controller, and we are responsible for complying with the UK GDPR.

Director

The Director has day-to-day responsibility for ensuring that this policy is implemented, adopted and adhered to by employees and all other individuals who process personal information on behalf of **Greatway**

Employees

All employees and any other individuals who process personal information on behalf of **Greatway**, are responsible for complying with this policy in its entirety.

Failure to comply with this policy may result in disciplinary action being taken, or the termination of an employment contract.

5. Data protection principles

The UK GDPR sets out several key principles which govern how **Greatway** handles personal information. Complying with these principles helps us to ensure that we comply with the law, and that our practices in relation to data protection are good.

The principles state that personal information must be:

- Processed in a way that is lawful, fair, and transparent (*"lawfulness, fairness, and transparency"*)
- Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes (*"purpose limitation"*)
- Adequate, relevant, and limited to what is necessary (*"data minimisation"*)
- Accurate, and where necessary, kept up to date (*"accuracy"*)
- Kept for no longer than is necessary (*"storage limitation"*)
- Processed in a way that ensures it is safe and secure, by means of appropriate technical and organisational measures (*"integrity and confidentiality"*)

The UK GDPR requires us to be able to evidence that we are complying with these principles. This is called the “accountability principle”.

Lawfulness, fairness, and transparency

We only process personal information where there is a lawful basis for doing so. The lawful bases are as follows:

- Where the data subject has given us their consent to the processing
- Where processing is necessary for the performance of a contract, or to enter into a contract, with the data subject
- Where processing is necessary to comply with a legal obligation that we are subject to
- Where processing is necessary to protect the vital interests of the data subject or another person
- Where processing is necessary for the performance of a task carried out in the public interest
- Where processing is necessary for the purposes of the legitimate interests pursued by **Greatway** or by a third party, except where such rights are overridden by the interests or fundamental rights and freedoms of the data subject

We will only process special category data where a lawful basis has been identified from the list above, plus one from the following list:

- The data subject has given us their explicit consent
- The processing is necessary for the purposes of exercising or performing any right or obligation which is imposed on **Greatway** in relation to employment, social security, and social protection law
- The processing is necessary to protect the vital interests of the data subject or another person, where the data subject is physically or legally incapable of giving consent
- The processing is necessary for the establishment, exercise, or defence of legal claims
- The processing is necessary for reasons of substantial public interest
- The processing is necessary for the assessment of the working capacity of an employee

The principle of fairness means that personal information should be used in a way that the data subject would reasonably expect.

The UK GDPR defines ‘consent’ as *“any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her”*.

When we rely on consent as the basis for processing personal information, we will ensure that the data subject is able to withdraw their consent as easily as they gave it, and at any time.

We will always use the most appropriate basis for processing personal information.

The principle of transparency requires us to ensure that any information provided by us to data subjects about how their personal information will be processed, is concise, easily accessible, easy to understand, and written in plain language.

Purpose limitation

We will be clear from the very beginning as to why we are collecting personal information and what we intend to do with it.

We will only collect personal information for specified, explicit, and legitimate purposes, and we will not process information in any way that is incompatible with those purposes.

If things change, and we intend to use personal information for a different purpose, we will make sure that the new use is fair, lawful, and transparent. We will always inform data subjects before we use their personal information for a new purpose, and where the lawful basis relied upon for the original purpose was consent, we will obtain such consent again.

Data minimisation

The personal information that **Greatway** collect and processes will be adequate, relevant, and limited to what is necessary in relation to the purposes for which it is to be processed.

Accuracy

The personal information that **Greatway** collects and processes will be accurate and, where necessary, kept up to date, and will be corrected or deleted without delay when we are notified that the information is inaccurate.

All employees are required to update all relevant records if they become aware that any personal information is inaccurate.

Storage limitation

We do not keep personal information for longer than we need it.

We carefully consider how long we keep personal information for, and we justify our reasons for keeping it. Most of our retention periods are determined by legal timescales. For example, personal information relating to income tax contributions.

We have a retention schedule in place which details the types of personal information we hold, the reasons for holding it, and the retention period. This schedule forms part of our Record of processing activities (**please see Section 12**).

We regularly review the data we hold and delete or securely destroy it when we no longer need it.

Integrity and confidentiality

We take our responsibilities under data protection laws very seriously and we will always ensure that we have appropriate security measures in place to protect the personal information we hold.

This means that we will have appropriate measures in place to protect personal information against unauthorised or unlawful processing, accidental loss, destruction, or damage.

Greatway employees are responsible for ensuring the security of the personal information processed by them in the performance of their duties and tasks.

6. Keeping personal information secure

We have appropriate technical and organisational measures in place to ensure that we process personal information securely, and to prevent personal information we hold being accidentally or deliberately compromised.

Technical measures

- We enforce strong password policies; passwords are changed at appropriate intervals and are not shared or used by others
- We ensure that laptops, USB/memory sticks and other portable devices containing personal information are encrypted
- We have a firewall, anti-virus, and anti-malware software in place
- We restrict access to systems, so personal information is only accessible to those people who need to use it as part of their work
- Personal information held electronically is backed up on each weekday, using AES 256 password strength encryption
- Paper documents containing personal information are securely destroyed using a shredder when they are no longer required

Organisational measures

- We provide data protection awareness training to all employees during their induction and annually thereafter
- We have appropriate policies and procedures in place to ensure our employees fully understand their responsibilities under data protection laws
- We ensure that our employees and any other individuals who process personal information on behalf of **Greatway**, are aware of their individual responsibilities under data protection laws and how these apply to their areas of work

- We promptly investigate all suspected personal data breaches; we always make the appropriate external notifications (where applicable) and seek to learn any lessons from the incident to reduce the risk of reoccurrence.
- Paper documents containing personal information are securely locked away when not in use
- Paper documents containing personal information are securely destroyed using shredders when they are no longer needed
- Employees take every opportunity to ensure that the personal information we hold is accurate and kept up to date
- Employees do not disclose personal information to any unauthorised persons, both externally and within **Greatway**

We regularly test, assess, and evaluate the effectiveness of the measures we have put in place, and act on the results of those tests where they highlight areas for improvement.

7. Managing personal data breaches

We have a procedure in place for managing and responding to personal data breaches.

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

Examples are personal data breaches include:

- Sending personal data to the wrong person
- Access to personal data by an unauthorised third party
- Devices or equipment containing personal data being lost or stolen

All suspected personal data breaches and security incidents must be reported **without delay** to the Director. All personal data breaches will be investigated promptly and recorded on our internal data breach register.

The Director is responsible for deciding whether a personal data breach needs to be reported to the ICO and data subjects.

Notifying the ICO and other external authorities

Where a personal data breach is likely to result in a **risk to the rights and freedoms** of a data subject(s), we will notify the ICO within 72 hours of becoming aware of the breach.

We may be required to notify a personal data breach to other external authorities. For example, we may be required to notify the Police or a funding authority. The Director is responsible for agreeing all external notifications.

Notifying data subjects

Where a personal data breach is likely to result in a **high risk to the rights and freedoms** of a data subject(s), the Director will communicate the personal data breach to the data subject(s) without undue delay.

When informing the data subject(s) about the breach, we will provide in clear, plain language, the following information:

- Details about the nature of the breach
- The name and contact details of the organisational point of contact, who the data subject(s) can contact if they require further information
- The likely consequences of the breach
- Measures taken, or proposed to be taken, to address the breach including measures mitigate possible adverse effects

8. Responding to requests from individuals ('rights of data subjects')

The UK GDPR provides data subjects with a number of rights in relation to their personal information.

These are:

- The right to request a copy of the personal information we hold about them
- The right to request that inaccurate or incomplete information about them is rectified
- The right to request that their personal information is deleted
- The right to request that the processing of their personal information is restricted
- The right to data portability
- The right to object to the processing of their information
- The right to complain to the ICO if they are not happy with how their personal information has been processed, or they feel their data protection rights have been infringed

We will endeavour to respond to all requests without delay, and in any event within one month of receiving a request. There may be circumstances when we need to extend the time limit for responding to a request. We will tell the individual who has made the request if this is the case and keep them informed.

Before responding to a request, we may need to ask for further information and/or proof of the individual's identity.

There may be exceptions to the rights outlined above; each request we receive will be reviewed on a case-by-case basis.

9. Document retention

We do not keep personal information for longer than we need it.

We carefully consider how long we keep personal information for, and we justify our reasons for keeping it. Most of our retention periods are determined by legal timescales. For example, personal information relating to income tax contributions.

We have a retention schedule in place which details the types of personal information we hold, the reasons for holding it, and the retention period. This schedule forms part of our Record of processing activities (**please see Section 12**).

We regularly review the data we hold and delete or securely destroy it when we no longer need it.

10.Data protection by design and default

We consider data protection and privacy issues upfront in everything we do. We are required to do this under the UK GDPR.

We make sure that when we are designing and implementing a new organisational system, service, or practice, we consider the data protection issues before we begin. We also make sure, by default, that we only process personal information where it is necessary to do so.

11.Data processors

Whenever we use a third party to process personal information on our behalf, we will always undertake appropriate due diligence and ensure a data processing agreement is in place.

We only use processors that provide us with sufficient guarantees about their security measures.

12.Record of processing activities

Greatway maintains a record of its processing activities, as is required under Article 30 of the UK GDPR.

This record is held in electronic format and contains the following information:

- Our organisation name and contact details
- A description of the personal information we process
- Categories of data subjects
- Purposes of the processing
- Recipients of the personal information
- The name of any countries or organisations outside the UK that we transfer personal information to, together with information about the safeguards in place
- Retention periods
- A general description of our technical and organisational security measures e.g. encryption, access controls, and training.

We regularly review the personal information we process and update this record accordingly.

This record will be made available to the ICO, if requested.

13. Data Protection Impact Assessments (DPIAs)

A Data Protection Impact Assessment (DPIA) is a process that helps us to identify and minimise the data protection risks associated with a project, process, or activity involving the processing of personal information.

We are required to carry out a DPIA for any processing that is likely to result in a high risk to individuals. We will also carry out a DPIA for any other major project which requires the processing of personal information, because it is good practice to do so.

The DPIA will:

- Describe the nature, scope, context, and purposes of processing
- Assess necessity, proportionality, and compliance measures
- Identify and assess risks to individuals
- Identify any additional measures to mitigate those risks

We will record the outcome of the DPIA and implement the measures identified.

14. Appointment of a Data Protection Officer

Under Article 37 of the UK GDPR, controllers and processors are required to appoint a Data Protection Officer if:

- The processing is carried out by a public authority or body
- The core activities of the controller or processor consist of processing operations which require regular and systematic monitoring of individuals on a large scale
- The core activities of the controller or processor consist of processing on a large scale of special categories of data or personal data relating to criminal convictions and offences

The status of our organisation and the scope of our processing activities means that we are not required to appoint a Data Protection Officer.

We will keep this decision under review, should our processing activities change.

15. AEGIS

As part of the accreditation process, **Greatway** is required to send the AEGIS office a copy of the contact details for all their homestays, partner schools and parents. They will also provide the names

of the students. This data is held securely by AEGIS and is destroyed once the inspection process is finished.

16. Policy review

This policy was last updated in January 2026

We will review this policy on an annual basis, or when there is a change to data protection laws or our organisational policies and procedures.

Greatway Guardianship and Educational Services Privacy Notice

Greatway Privacy Policy

When you interact with **Greatway**, you trust us to handle your personal information with care. We will always be clear about the ways in which we intend to use your personal information, and the choices and rights you have in relation to it.

This Privacy Policy explains how we collect, use, and store your personal information in relation to your use of this website and the services we offer. It explains what your legal rights are and how you can exercise them. For example, how you can request a copy of the personal information we hold about you.

Please take the time to read this Privacy Policy; it is an important document, and you need to ensure that you understand it. If you have any questions about anything contained in this Policy, please get in touch.

You can write to us at the following address:

**15, Rodney Road,
Cheltenham,
GL50 1HX**

Or send us an email: stephanie@greatwayeducation.com

1. About us

We are **Greatway**, referred to throughout this Privacy Policy as “**Greatway**”, “we”, “our”, or “us”.

We are a guardianship provider and our main priority is a child’s welfare. We serve as a trusted point of contact between parents, students, schools, and homestay families. We act **in loco parentis**, meaning we take on the parental role while a child is studying in the UK. We liaise between parents, homestays, UK schools and students.

We are a registered company in England and Wales under company number 08652334 and our registered office is at **15, Rodney Road, Cheltenham, GL50 1HX**.

For the purposes of this Policy, **Greatway** is the data controller, and we are registered with the Information Commissioner’s Office under registration number is ZB999005.

2. How we collect personal information

We collect personal information about you whenever you engage with us, apply for a job with us, or use one of our services.

This includes:

- When you use our website
- When you contact us via email, telephone, or post
- When you interact with us on social media platforms e.g. by posting a message on one of our accounts
- When you make a complaint
- When you contact us to exercise one of your legal rights e.g. the right to access your personal information
- When you apply for a job with us
- When you attend a job interview
- When you register to attend an event or training course organised by us
- When you subscribe to our newsletter
- When you apply to use our services

In addition, we may receive personal information about you from other individuals or organisations.

This includes:

- When a **Greatway** employee provides your contact details as an emergency contact
- When a job applicant gives your name and contact details as a referee
- When a referee provides information about you during the recruitment process
- When a complainant refers to you in their complaint correspondence

3. What personal information we collect about you

Personal information means any information that relates to an identified or identifiable individual. The types of personal information we collect about you depends on the nature of your interactions with us.

Depending on the circumstances, we might collect any of the following types of information:

- Your name, address and contact details, including email address and telephone number
- Date of birth
- Financial information, such as payment related information or bank account details

- Technical information, including the type of device you are using to access our website, the Internet Protocol (IP) address, and the browser and operating system being used to connect your device to the internet.
- Information about your visit to our website, including pages you visit and how you use the website
- Details relating to a job application you have made, such as your covering letter and CV, your education and employment history, and any other information relevant to the recruitment process (**please see Section 4a for more information about the recruitment process**)

In some circumstances, we may collect information about you which is sensitive. This is called special category data. We may also collect information about your criminal history. For example, if you apply for a job with us, you may be required to undertake a Disclosure and Barring Service (DBS) check.

We will discuss these types of information in more detail in **Section 4a**.

4. How we use your personal information

We must have a lawful, valid reason for using your personal information.

The main lawful reasons that we rely on to process your personal information are:

- **Contract performance:** where your personal information is necessary to enter into or perform our contract with you
- **Legal obligation:** where we need to use your personal information to comply with a legal obligation
- **Legitimate interests:** where we use your personal information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights
- **Consent:** where you have given us your consent to use your personal information (you may withdraw your consent at any time)

We may use your personal information to:

- Deal with your enquiries, requests, or complaints
- Send you details about forthcoming events and training courses which you have requested, and we feel would be of interest to you
- Send you communications which you have requested to receive from us
- Process your application for guardianship if you are a parent
- Carry out our obligations under any contracts entered into between you and us, or to meet our legal obligations to regulators, government, and/or law enforcement bodies
- Assess your suitability for a job you have applied for, and to progress your application through the recruitment process (**please see Section 4a for more information about our recruitment process**)

- Better understand how you interact with our website, including pages you visit and areas that are of most interest to you. This is so we can improve our website, the user experience, and target our audience more effectively.

4a. How we use your personal information during the recruitment process

When you apply for a job with us, we will collect and process your personal information. We will only collect personal information that is necessary to assess your suitability for the job you have applied for, to progress your application and keep you updated throughout the process, and to comply with any legal or regulatory obligations.

We collect personal information about you either directly from you or from a third party such as a recruitment agency.

The information we collect may include:

- Your name, address and contact details, including email address and telephone number
- Details about your qualifications (including copies of certificates), skills, experience, and employment history
- Details about any professional memberships you hold
- Information gathered from any interviews you attend
- Information about your current salary level, including benefits and pension entitlements
- Information about your right to work in the UK

In some circumstances, we may collect and process information about you which is sensitive.

This may include:

- Information about your racial or ethnic origin, religious or philosophical beliefs, or sexual orientation for the purpose of our equal opportunities monitoring
- Whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process
- Information about criminal convictions and offences

As part of our recruitment process, we may ask applicants to complete an equal opportunities questionnaire. This is not mandatory; it is entirely your choice as to whether you provide us with this information and there are no adverse consequences if you choose not to.

If you do choose to provide this information to us, we will not make it available to any employees outside of our recruitment team in a way that can identify you. We will use this information to produce and monitor equal opportunities statistics.

If your application for employment is unsuccessful, we will retain your personal information for 6 months. At the end of that period, your personal information will be deleted or securely destroyed, unless we need to retain it for longer to exercise or defend any legal claims, or you have agreed that we can retain your details in our talent pool for a period of 12 months, should any suitable vacancies become available during that time.

If your application for employment is successful, any personal information gathered during the recruitment process will be transferred to your employee file and retained for the duration of your employment with us, plus a period of 6 years following the end of your employment.

When an offer of employment is made to you, we will be required to undertake pre-employment checks. For example, we may collect personal information about you from third parties, such as references from current or former employers, information from background check providers, and criminal record checks from the Disclosure and Barring Service (DBS). We will only seek this information once an offer of employment has been made to you and we will always tell you before we do this.

Once the necessary pre-employment checks have been completed, and the outcomes are satisfactory, we will collect and process additional personal information relating to your employment.

This includes:

- Your bank or building society details, so we can process your salary
- Your emergency contact details, so we know who to contact in the event of an emergency at work

You are under no statutory or contractual obligation to provide your personal information to us during the recruitment process. However, if you do not provide this information, we may not be able to process your application properly or at all or provide any reasonable adjustments during the recruitment process.

5. Who we share your personal information with

We will only share your personal information with other organisations where it is lawful for us to do so. When we share your personal information, we will only share the information that is necessary. We will always share information securely and ensure we are giving it to the right recipient.

We may share your personal information with others in the following circumstances:

- Where we are required to do so to comply with a legal or regulatory obligation. For example, we are legally required to provide information about employee income tax contributions to HMRC.
- In an emergency. For example, where we need to protect a person from serious harm.
- Where we have safeguarding concerns about a child, and we need to alert the local authority.
- Where we are required to do so to comply with the instructions of a law enforcement authority. For example, we might receive a request from the Police for personal information we hold about an individual, to help them investigate a crime.
- To protect our business interests

We may also share your personal information with third parties who provide a service to us. For example, staff members, homestays and school staff.

When we use third parties to process personal information on our behalf, they are required to follow the same rules and information security requirements as us and are not permitted to reuse your personal information for any other purpose. We only share the personal information that is necessary to deliver the service.

We will not share your personal information with third parties for marketing purposes and we will never rent or sell your personal information to any other organisation or individual.

6. How we keep your personal information safe

We have robust technical and operational security measures in place to protect your personal information against unauthorised access or unlawful use.

In addition, we limit access to your personal information to those employees, contractors, and other third parties who have a legitimate business need to know. They will only process your personal information on our strict instructions, and they are subject to a duty of confidentiality.

We maintain internal policies and procedures regarding data protection and confidentiality to ensure that our employees are aware of and understand their responsibilities in relation to your personal information.

We have a robust procedure in place to deal with any suspected personal data breaches. We will notify you and the Information Commissioner's Office (ICO) of any breach within the specified timescales where we are legally required to do so.

You too can play a part in helping to keep your personal information safe. This includes choosing strong passwords, being alert to any fraudulent emails that might appear to be from us (when they are not) and using suitable anti-virus software on your device.

7. How long we keep your personal information for

We carefully consider how long we keep your personal information for and only keep it for as long as is necessary to fulfil the purpose it was collected for.

We review our data retention periods on a regular basis to ensure that personal information is not held for longer than is necessary. We regularly review the information we hold and delete or securely destroy it when we no longer need it.

In some circumstances, we may anonymise your personal information (so that it can no longer be attributed to you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

8. Children's personal information

Greatway retains student's information in order to fulfill our role. This may include:

- Name, address, date of birth
- Details of ethnicity
- Contact details, such as phone numbers, email addresses and addresses
- School details
- Medical information
- Copies of passport, BRP and police checks
- Details of bank accounts and finances
- Details of mobile phone accounts
- Information on food preferences, interests and hobbies
- Copies of school reports
- Records of meetings held with students and schools

This information is treated as sensitive information and is stored securely as explained in this notice and is only shared with others on a need-to-know basis. **Greatway** may share information with staff members, homestays and school staff. **Greatway** may share information with external agencies where there is a safeguarding concern.

Through this privacy notice, **Greatway** provides information to students and their parents about what records we hold, why we need to hold them and who we might share their information with (for example as part of a multi-agency child protection team) (Information Commissioner's Office, 2021). If we are keeping records for child protection reasons, please note that we don't necessarily need to get consent from the adults and/or children concerned.

We will store general student records for a minimum of 6 years after student departure.

Child Protection Records

Greatway is required to keep child protection records where there has been a safeguarding concern. These will be stored separately to other information in a secure file. There will be one file for each child and access is limited to the DSL and DDSL. If it is necessary to share records (within our organisation or externally), we will ensure that they are kept confidential. We will use passwords and encryption when sharing electronic files. If the person responsible for managing our child protection records leaves, **Greatway** will appoint somebody to take over their role and arrange a proper handover.

We will store any child protection records until a child turns 25

9. Marketing

We will keep you up to date with our latest news and details about any services, upcoming events or training courses if you have told us that you are happy to receive marketing communications from us.

If you decide that you no longer want to hear from us, you can opt-out at any time. You can do this by contacting us using the details contained in this Policy, or by clicking on the 'unsubscribe' link contained in any email marketing communication you receive from us.

10. Links to third-party websites and services

This website may include links to other websites and applications that are operated by third parties. For example, we provide links to websites of other organisations, including accredited guardianship organisations and member schools. When you click on one of these links, you will be directed to that website.

We do not have any control over these third-party websites, and we cannot take any responsibility for any information you might give to them.

When you leave our website, we encourage you to read the privacy notice of every website you visit so you can understand how that website will collect and use your personal information.

11. Cookies

A cookie is a small file of letters and numbers which is downloaded to your device when you access a website. When you visit a website, that site will ask your device for permission to store this file.

Cookies are used by many websites and have several different uses. For example, they can remember your preferences and count the number of people who have visited a website.

At **Greatway**, we use 'session cookies' and 'persistent cookies'.

'Session cookies' are those which expire at the end of your browser session. They allow a website to recognise and link the actions of a user during a browsing session. This means we can gather statistics to help us understand how our website is being used, and to improve its structure.

'Persistent cookies' are stored on a user's device in-between browsing sessions. They help us to recognise you as a unique visitor to our website and allow us to tailor the content of certain areas.

You can use your web browser to accept, decline, or delete cookies. You can also clear cookies at the end of your browsing session. Most web browsers automatically accept cookies, but you can modify your browser settings to decline cookies if you prefer. This may, however, prevent you from taking full advantage of our website.

12. Your legal rights

We want to ensure that you are always in control of your personal information.

We have outlined below what your legal rights are in relation to your personal information, together with details as to how you can exercise them.

- **The right to access your personal information**

You have the right to request a copy of the personal information we hold about you.

- **The right to edit and update your personal information**

You have the right to request that your personal information is rectified if it is inaccurate or incomplete.

- **The right to request to have your personal information erased (also known as the 'right to be forgotten')**

You have the right to request that your personal information is erased. However, this is not an absolute right, and it only applies in certain circumstances. For example, the law may require us to keep some types of personal information for a specific period of time.

We will review each request on a case-by-case basis.

- **The right to restrict the processing of your personal information**

You have the right to request the restriction or suppression of your personal information. However, this is not an absolute right, and it only applies in certain circumstances.

When processing is restricted, we will continue to store your personal information, but we will not use it.

- **The right to object to your personal information being used**

You have the right to object to the processing of your personal information at any time. However, this is not an absolute right, and it only applies in certain circumstances.

You do, however, have an absolute right to stop your personal information being used for direct marketing purposes.

- **The right to data portability**

You have the right to request that we transfer your personal information from one organisation to another or give it to you. This right only applies to information that you have provided to us and is held electronically.

- **The right to complain to a supervisory authority if you believe we have not handled your personal information in accordance with data protection laws**

You can make a complaint or raise a concern about how we process your personal information by contacting us using the details set out below.

If you are not happy with how we have handled your complaint, or you believe that your data protection or privacy rights have been infringed, you have the right to complain to the Information Commissioner's Officer (ICO). The ICO is the UK's independent body established to uphold information rights.

If you wish to exercise any of the rights outlined in this section, please write to us at the following address:

**15, Rodney Road,
Cheltenham,
GL50 1HX**

Or send us an email: stephanie@Greatwayeducation.com

We will endeavour to respond to all requests without delay, and in any event within one month of receiving your request. There may be circumstances when we need to extend the time limit for responding to a request. We will tell you if this is the case and keep you informed.

Before responding to a request, we may be required to ask for further information and/or proof of your identity.

Please keep in mind that there are exceptions to the rights outlined above and although we will always try to respond to your satisfaction, there may be situations where we are unable to do so.

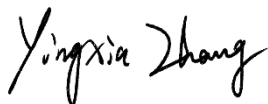
13. Changes to our Privacy Policy

This Privacy Policy will be regularly reviewed and may change from time to time. If it does, the most current version will always be available on this website.

We will keep our privacy notice under regular review. Our privacy notice will be next reviewed in 3 years or sooner if data protection legislation changes in the interim, therefore the review date will be 21 January 2028

This privacy notice was last reviewed on: 12 January 2026

Signed:



Date: 12.01.2026

Greatway Guardianship & Educational Services Whistleblowing Policy

Where there are concerns over Safeguarding, Abusive Behaviour, Bullying, Extremism or Radicalisation, all Students, Staff and Management will be encouraged to make use of our internal systems to Whistle Blow or raise any issue in confidence.

Don't think 'what if I'm wrong?' - think 'what if I'm right?'

Greatway is committed to safeguarding and promoting the welfare of its students/staff and encourages an open and supportive culture. This policy explains the procedures that everyone at **Greatway** should follow if he or she has concerns that the practice of anyone within the school may be harming another person. The policy should be read in conjunction with the following school policies and procedures:

- Safeguarding Policy
- Anti-bullying
- Abusive Behaviour
- Equality & Discrimination

Principles

Each individual has a responsibility for raising concerns about unacceptable practice or behaviour in order to protect or reduce the risks to others, to prevent the problem worsening and to protect other staff and the school.

We recognise that the decision to report a concern is difficult. We will not tolerate harassment or victimisation and will take all possible measures to protect anyone who raises concerns in good faith. If you raise concerns in good faith that are proved to be unfounded, no action will be taken against you. Where it is concluded that allegations have been made maliciously, disciplinary action may be taken.

We recognise that whistleblowing can be difficult and stressful. Advice and support will be offered where requested.

Barriers to whistleblowing

- Fear of being wrong
- Fear of reprisal
- Fear of escalation
- Fear of damage to career
- Fear of not being believed

This policy aims to address these fears.

Procedures

You should voice your concerns, suspicions or uneasiness as soon as you are able. Usually, you should report your concerns to the Director or any member of the Safeguarding Team. Make sure you are satisfied with the response.

Pinpoint what your concerns are. Ideally, these should be put in writing. Your report, written or verbal, should set out the background and history of the concern, giving names, dates and places where possible, and the reason for your concern. You will not be expected to prove the truth of your allegations, but you should demonstrate sufficient cause for concern.

Concerns will be treated in confidence and we will make every effort to maintain your anonymity, if you wish. However, at the appropriate time, you may need to provide evidence. You will be given information on the nature and progress of any enquiries and supported, as necessary.

Self-reporting

We recognise that staff may experience difficulties, such as physical or mental ill health or personal problems, which could impinge on their professional competence. Staff should report such difficulties to their manager so that professional and personal support can be offered. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where the difficulties raise concerns about the welfare or safety of other people.

Immediate Safeguarding Response

Where a concern indicates immediate risk to a student's safety or wellbeing, or allegations of abuse, neglect, or exploitation, the organisation will take urgent protective action, notify relevant safeguarding leads and escalate to external authorities where required (e.g. child protection, police, regulators).

Safeguarding action takes precedence over all other steps. If a safeguarding response is required, the safeguarding policy will be followed.

Initial Assessment

All disclosures will be assessed promptly to determine whether the matter falls within this process and the level of risk to the student(s). The legal, regulatory, or AEGIS implications will be investigated and an assessment of whether interim measures are required will be conducted.

Investigation

Where appropriate an independent and suitably qualified investigator will be appointed and any conflicts of interest will be managed. All information will be gathered fairly and confidentially. Relevant parties will be given an opportunity to respond and accurate records will be maintained.

Outcomes and Actions

Outcomes may include:

- Disciplinary or contractual action
- Removal or suspension of carers, host families, or agents
- Referral to education providers or regulators
- Policy, training, or system improvements
- Safeguarding or welfare interventions for students

Feedback to the Whistleblower

Where lawful and appropriate, the whistleblower will be informed that the concern has been reviewed or investigated and whether action has been taken or is planned. Specific details may be limited due to privacy and student protection obligations.

Protection from Retaliation

The organisation prohibits retaliation against anyone who raises a concern in good faith. This includes:

- Threats, intimidation, or harassment
- Discrimination or disadvantage
- Termination of employment or contracts

Retaliation will be treated as serious misconduct.

Confidentiality and Records

Whistleblower identities will be protected wherever possible and information will be shared strictly on a need-to-know basis. Records will be stored securely in line with privacy laws and AEGIS expectations

External Reporting

Nothing in this process prevents reporting to:

- Education regulators or authorities
- Child protection or safeguarding agencies
- Law enforcement
- AEGIS or other relevant sector bodies

Monitoring and Review

- Whistleblowing data will be reviewed to identify trends and risks
- De-identified reporting will support governance oversight
- This process will be reviewed regularly to maintain alignment with AEGIS standards and regulatory requirements

Equalities

Greatway provides education for all, acknowledging that the society within which we live is enriched by diversity. As stated in our Equality policy, we strive to ensure that the culture and ethos of our school reflects the diversity of all members of the school community, where everyone is equally valued and treats one another with respect and fairness.

NSPCC and Protect

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

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on: 12th January 2026

Signed:



Date: 12.01.2026