

Bright World Guardianships Ltd

Safeguarding Policy and Procedure Document



bright world



Policy	
Summary	<p>This policy summarises current working practices in relation to safeguarding children and young people of any age, who may be at risk of abuse in the context of Bright World Education and Guardianships.</p> <p>The document details the policy aims, safeguarding measures, Safer Recruitment, response to individual concerns, use of IT and the internet, Information Sharing and Confidentiality.</p> <p>The policy is linked to the Child Protection Policy and supports requirements of AEGIS (Association for the Education and Guardianship of International Students) accreditation and Travel Safe guidance.</p>
Policy Owner	Director of Safeguarding and Operations
Date Introduced	May 2016
Next Review Date:	May 2017
Related documents:	Child Protection Policy





Policy

This policy is linked to Bright World Guardianships' Child Protection Policy and describes the policy aims, safeguarding measures, Safer Recruitment, response to individual concerns, use of IT and the internet, information sharing and confidentiality. The policy is linked to the Child Protection Policy and supports requirements of AEGIS accreditation and Travel Safe guidance. Travel Safe were a child protection charity set up by Avon and Somerset Police to lead safeguarding of children and young people away from home, particularly in the global youth travel sector. The charity has since closed and Bright World are working in partnership with a replacement accreditation body called SAFE (Safeguarding Associates for Excellence).

This policy focuses on the measures in place for students of any age who are under the care of Bright World Guardianships Ltd.

In line with our mission statement, this policy supports Bright World Guardianships' duty to safeguard and promote the welfare of students. The mission statement is made with reference to Statutory Guidance for Schools and Colleges on Safeguarding Children and Safer Recruitment in Education, Department for Education, July 2015: Keeping Children Safe in Education, May 2016 and Working Together to Safeguard Children, March 2015. Bright World Guardianships' policies and processes are in line with the requirements of the Association of Education and Guardianship of International Students (AEGIS), National Minimum Boarding Standards and sector specific accredited training experts.

Bright World Guardianships refers to various expert sources advice on child abuse and safeguarding, for example National Society for the Prevention of Cruelty to Children (NSPCC) website, Barnardo's and the Local Safeguarding and Children's Board (LSCB) when developing policies and managing incidents.

Local Agency Contacts

The company is aware of how to access local agency contacts. This includes Local Safeguarding and Children's Boards across the country, how to access locally agreed inter-agency procedures, guidance and members of the Board. 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.

Bright World Guardianships Contacts

The Designated Safeguarding Lead for the Company is Claire Taylor, Director of Safeguarding and Operations who can be contacted on 01273 836782 or ctaylor@brightworld.co.uk

The Deputy Safeguarding Lead is Lana Foster, Managing Director who can be contacted on 01273 835745 or lane@brightworld.co.uk

Concerns in relation to the Managing Directors should be addressed to the Director of Safeguarding, Claire Taylor. Concerns in relation to the Director of Safeguarding should be addressed to Lana or James Foster. Concerns about all Directors above should be directed to Crimestoppers which will remain confidential.



1. Application of this policy

This policy applies to all 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. This policy also applies to those who provide homestay accommodation for our students and third party contractors.

2. Aims of the policy

2.1 This policy aims to:

- ensure that Bright World Guardianships students have a safe and child-centred environment which promotes and prioritises their safety and well being
- support children's development by protecting them from specific safeguarding issues and all forms of child abuse
- create a culture of safe recruitment and adopt procedures that help deter, reject or identify people who might abuse children
- ensure that all Bright World Guardianships staff have a valid enhanced DBS check, understand their role and responsibility in respect of identifying safeguarding opportunities and reporting child protection concerns, are provided with regular training opportunities for staff to help them develop their knowledge, understanding and professionalism (refer to Professional Code of Conduct - Bright World Staff Handbook)
- ensure that appropriate action is taken in the event of incidents or concerns of abuse being reported to Bright World staff and that support is provided to individuals who raise or disclose the concern
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored

2.2 The policy will be reviewed every year after development or sooner if in response to changes in legislation/government guidance, as required by the LSCB and as a result of any other significant change or event.

3. Safeguarding Policy and Key Principles

3.1 Bright World Guardianships' understands 'Safeguarding' to be a recognised multi-agency pro-active process for protecting children at risk of harm or potential abuse. Effective safeguarding will reduce the need for action to protect children from harm. Bright World aims to protect children from the four main types of abuse:

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





Sexual abuse - involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact including both penetrative or non-penetrative acts such as kissing, touching or fondling the child's genitals or breasts, vaginal or anal intercourse or oral sex. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. This form of abuse can happen online.

Emotional abuse - is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. Emotional abuse (passive or active) 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 participating in normal social interaction. This form of abuse may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying), 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, though it may occur alone.

Neglect - Neglect is the ongoing failure to meet and child's basic needs and is the most common form of child abuse. The four types of neglect are physical neglect, educational neglect, emotional or medical neglect. For example, a child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents. A child who's neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage - even death.

In addition, this policy aims to protect children and young people from other forms of child abuse:

- Radicalisation and extremism
- Child trafficking including Child Sexual Exploitation
- Female Genital Mutilation
- Cyber-bullying and bullying
- Grooming
- Domestic abuse
- Online abuse
- Harmful sexual behaviour

Part One of 'Keeping Children Safe in Education' (2016) and 'What to do if you're worried a child is being abused' (2015) outlines the signs and symptoms of the different forms of child abuse. The documents contain examples of relevant signs which staff may notice in information from the students, schools, Local Coordinators or other staff member for example.

3.2 This policy should be used read in conjunction with 'Working together to Safeguard Children 2015', 'Keeping Children Safe in Education 2016' and the Local Child Safeguarding Board guidance in the area. The policy is in line with requirements of AEGIS accreditation and Travel Safe guidance (Avon and Somerset Police).





3.3 Bright World understands 'Child Protection' to be a part of safeguarding and promoting welfare. The term refers to the activity undertaken to protect specific children who are suffering or at risk of suffering significant harm. Refer to Bright World Child Protection Policy - Operations Manual.

3.4 The mission statement of the company is "Bright World is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment".

'Safeguarding and promoting the welfare of children is defined as: "protecting children from maltreatment, preventing impairment of children's health or development; ensuring that children are growing up in circumstances consistent with the provision of safe and effective care", and "undertaking that role so as to enable those children to have optimum life chances and to enter adulthood successfully (Sussex LCSB, September 2015)

3.5 Bright World works to ensure that all members of staff are aware that the responsibility for specific safeguarding issues and child protection from all forms of abuse belongs to everyone, and that families, communities and professionals must work together to promote their welfare.

3.6 Bright World Head Office Staff are trained to Safe Level 3 and Local Coordinators are trained to Level 2 (with renewal training being every 3 years). The Accommodation and Travel Department is Safer Recruitment trained and this is due for renewal every 3 years. Annual training is made available to staff at the yearly conference. Child Safe Level 1 training has also been made available to all host families and taxi companies with a request for completion (Summer-Autumn 2015).

3.7 Bright World is committed to providing all employees with a healthy and safe work environment which allows complaints to be dealt with and resolved within Bright World, without limiting a person to pursue the resolution of their complaint with the relevant statutory authority. Refer to 'Understanding bullying, discrimination and harassment' policy and procedure; Whistle Blowing Policy; Welfare, Health and Safety Policy - Bright World Staff Handbook.

4. Safeguarding measures, training and development

4.1 Bright World Guardianships students are provided with a safeguarding handbook and membership card which details the 24 hours 7 days a week emergency number should they wish to speak a Guardianship Care Manager from Head Office.

4.2 Students are provided with the telephone number and email address of their Local Coordinator ('Bright World Buddy') as an alternative means of contacting a member of staff with any concerns or issues.

4.3 Students are provided with information on what to do if they need help of advice while in the UK. The leaflet is a safeguarding measure and outlines to students where they can go to obtain help and support if they are troubled. The leaflet includes contact details for (amongst other organisations) the NSPCC, Samaritans and Police.



4.4 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, Bright World Guardianships undertakes the following:

1. To train Head Office staff to a minimum of Level 3 Child Protection training with Local Co-ordinators being trained to a minimum of Level 2. Head Office staff maintain the responsibility of responding to CP concerns raised by students, other guardianship personnel, host families and transfer companies.
2. To ensure Head Office staff record any allegations/concerns in an incident in IBOS and refer them to the Director of Safeguarding. Where appropriate concerns will be reported to the relevant Children's Services Duty team or Multi Agency Safeguarding Hub (MASH) in the local area.
3. To ensure that a Bright World On Duty Manager is available for advice and guidance if staff are not sure whether a referral to Children's Services is required. The On Duty Manager is able to contact the Director of Safeguarding for advice in relation to referrals, in addition to Lana Foster and James Foster as the strategic leads.
4. To ensure that all guardianship personnel receive CP Awareness Training and to make them and the students in our care aware of the need to report allegations and suspicions of child abuse to Head Office. In cases where the strategic leads are unavailable, staff must make direct contact where appropriate with the local Children's Services or MASH On Duty Team, as delay could put a child/Young Person at further risk of harm. Contact with the local Children's Services or MASH is made via the telephone numbers available on the Local Authority website.
5. To promote an environment of trust, openness and clear communication between students, school and Bright World Guardianship staff and our Host Families, so that student welfare, safety and pastoral care is recognised as the top priority
6. To respond to any reported allegation or suspicion of child abuse in accordance with the Bright World guidelines and those set out in the Child Protection Procedures of the Association for the Education and Guardianship of International Students (AEGIS)
7. To ensure that all guardianship personnel and personnel offering outsourced services who come into direct contact with students in our care, are recruited using safe recruitment practices and are formally screened through the completion of an Enhanced DBS check
8. To maintain links with the appropriate Agencies who have a statutory responsibility to deal with child welfare and child protection concerns. 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 Claire Taylor or Lana Foster by telephone at the office or out of hours via mobile telephone.



5. Safer Recruitment

5.1 Safer recruitment for staff members

5.1.1 Advertising a role

5.1.1.1 The safety and welfare of the child is paramount at every stage of the recruitment process, and this policy applies to the recruitment of all members of staff including Local Coordinators, host families and transfer companies.

5.1.1.2 Advertisements for roles make Bright World Guardianships commitment to safeguarding clear through the company's mission statement: "Bright World is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment", and reference to the responsibility for safeguarding and promoting the welfare of children in the job descriptions.

5.1.1.3 The Director of Safeguarding maintains the bank of job adverts in the Q Drive - Staffing Organisation - Safer Recruitment folder which is organised per role, and ensures compliance with Safer Recruitment guidance. This includes ensuring the job description makes reference to the responsibility for safeguarding and promoting the welfare of children.

5.1.1.5 The advertisement should highlight the need for applicants are required to complete an enhanced Disclosure and Barring Service check and bring evidence (i.e. original documents) of their identification to the interview, which will be checked and verified by the recruiting lead.

5.1.2 The Application Form

5.1.2.1 Application forms and Charters for the various roles within the company are currently being reviewed to ensure they meet the required standards. This includes application forms for host families, taxi drivers and Local Coordinators.

5.1.2.2 Applicants will be asked to declare that they are not disqualified from working with children through the Independent Safeguarding Authority's (ISA) Barring Lists, or subject to sanctions imposed by a regulatory or professional body, and has no convictions, cautions or bind overs. There will be a self disclosure process introduced to ensure the applicant has an opportunity to raise all information in a confidential way. Any disclosures can be discussed with them prior to or at interview (pending receipt of the completed enhanced DBS check).

5.1.3 The Job Description and Person Specification

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

5.1.3.2 The Person Specification is supplementary information to the job description and lists essential and desirable criteria for the post. This document will be reviewed by the Director of Safeguarding to ensure compliance with the Safer Recruitment guidance.



5.1.4 The Application Information Pack

5.1.4.1 An Information Pack for applicants is being developed. The pack will contain:

- The application form
- The job description and person specification
- Requirement to complete an enhanced DBS Disclosure
- Bright World will seek references and may approach previous employers for information and verification of experience or qualifications
- Relevant issues arising from references will be discussed with the applicant
- 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)
- Advise applicants that providing false information is 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.

5.1.5 Scrutinising and shortlisting applications

5.1.5.1 Two members of staff are responsible for scrutinising applications and short listing candidates. The guidance recommends that at least one member of the panel is Safer Recruitment trained.

5.1.5.2 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.

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

5.1.5.4 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.

5.1.5.5 All applicants will be assessed equally against the criteria contained in the person specification.

5.1.6 References

5.1.6.1 Bright World Guardianships seek references from 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.

5.1.6.2 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 with children or any disciplinary details.

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

5.1.6.4 Where (due to operational need) a reference is secured over the telephone, the reference must be obtained in writing to provide a record of the information obtained from the referee.



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

5.1.6.6 References should always be obtained in writing and telephone contact made to verify the reference where possible.

5.1.7 Interviews

5.1.7.1 The interview will be conducted by at least 2 people. The process will assess the merits of each candidate against the job requirements, and explore their suitability to work with children.

5.1.7.2 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.

5.1.7.3 The invitation to interview should 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 bring with them to interview their documentary evidence of their identity (for example current driving licence, passport, full birth certificate, plus documents for example 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.

5.1.7.4 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.

5.1.7.5 A copy of the documents used to verify the candidate's identity, right to work in the U.K. and qualifications must be kept for the personnel file. These should be checked, signed and dated by the verifier.

5.1.8 Scope of the interview

5.1.8.1 The interview panel should assess and evaluate the applicant's suitability for the post. Interview preparation material is being reviewed to ensure that the panel also explore the candidate's motivation for working with children and young people, their understanding of safeguarding and their ability to support the company agenda for safeguarding and promoting the welfare of children.

5.1.8.2 The panel should ask the candidate if they wish to declare anything in light of the requirement for an Enhanced DBS disclosure.

5.1.8.3 Where references have not been obtained before an interview, the candidate should be asked at interview if there is anything they wish to declare or discuss in lights of the questions that have been or will be put to his or her referees.

5.1.9 Conditional Offer of Appointment

5.1.9.1 The successful candidate will be conditional upon the receipt of references, 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. Details of the supporting documentation required are in the process of being reviewed to ensure compliance with the Safer Recruitment guidance.

5.1.10 Post Appointment: Induction

5.1.10.1 Newly appointed staff members have an induction programme to complete regardless of previous experience. The induction programme is being reviewed to ensure that the content meets the requirements of Safer Recruitment guidance.

5.1.10.2 The content and nature of the induction will vary according to the role and previous experience of the new member of staff, however will always include the safeguarding policy, staff code of conduct, how to report concerns, whistle-blowing policy and with who they should discuss any concerns about their role or responsibilities. The programme will contain Level 1 Child Protection Training.

6. Safeguarding for Taxi Recruitment and Travel Policy

6.1 Bright World Guardianships has a specific safeguarding policy for the recruitment of transfer companies and taxi drivers. The policy outlines the requirements for accrediting a new transfer company and for the on-going monitoring of the company.

6.2 Bright World Guardianships has a Travel Operations Policy and Process which ensures that our internal processes afford the highest levels of safeguarding to our students. The policy outlines the processes for booking transfers, sending taxi requests and confirmations to guarantee that students are safely transported to and from their destinations.

6.3 There is a safeguarding policy for students during a transfer (including shared journeys and ad hocs), including safeguarding a student at the airport (escort to terminal, unaccompanied minors, and Airport Angels). The policy is called 'Student Transfers including airports' Policy and Procedure.

7. Responding to individual safeguarding concerns

7.1 Bright World 'Child Protection Policy and Procedure' (Policy Manual) outlines the procedures for dealing with reports or information of a child protection nature. The same reporting procedure is used for responding to safeguarding incidents.

7.2 Staff must respond promptly to any safeguarding concerns and submit their concerns in writing as per Section 4 of the Child Protection Policy - Indicators of child abuse and response to individual concerns and Section 5 - Receipt of a suspected report of child abuse by the Designated Safeguarding Lead.

7.3 Incidents of students being reported as absent or missing from Bright World Guardianship (for example half terms or exeat weekends), must be dealt with as per the Bright World Missing Student Policy. Students who are reported as absent or missing from school premises during term time are accommodated by the relevant school's missing student policy.

7.3 As general guidance, schools have the lead on any incidents which happen during the term time with Bright World have the lead on any incidents which happen during an event (for example exeat weekend, half term or during a period of expulsion/suspension where the student is with a Bright World Host Family).



7.4 All reports to Bright World from Local Coordinators, schools, Guardianship Care Managers and students are initially regarded as children in need. The Deputy Safeguarding Lead is notified. The Bright World database system (IBOS) record is created on the Guardianship Student Record in order for the incident to be effectively managed, the safety of the student to be maximised and any risk to be minimised. Any report pertaining to Child Protection will be automatically classified it as a RED incident.

7.5 The IBOS incident is investigated through (where appropriate) discussions with the school, parents, LC's, existing records and other agencies as appropriate. Parental consent for referral will be sought unless the child may be at risk of significant harm or there may be the risk of a loss of evidential material. All verbal conversations should be recorded in writing.

7.6 The information is evaluated on the day of receipt and a decision made and recorded regarding the next course of action and/or outcome. This could include no further action (with the provision of information and advice or signposting to another agency), Bright World Emergency Meeting to decide on future actions, or emergency action to protect a child through the statutory authorities (e.g. Police or Social Services) where there is a risk to the life of a child or the possibility of serious immediate harm. (Refer to Bright World Missing Student Policy).

7.7 A member of the Senior Management Team must review, approve the outcomes of the incident and ensure the record has been updated. Members of the Senior Management Team are Lana Foster, James Foster, Claire Taylor and Charlotte Hamson.

7.8 Where a crime may have been committed the police must be informed at the earliest opportunity, and they will decide whether to commence a criminal investigation. The reporting of the matter to the police must be recorded in the IBOS record.

8. Bright World Guardianships Professional Code of Conduct for Staff

8.1 Bright World Guardianships Staff Handbook outlines the Professional Code of Conduct for staff members (Section 6) which includes acceptable practice and behaviour to avoid.

9. Use of IT and the Internet

9.1 Bright World Education Ltd and Bright World Guardianships Ltd believe information and communications technology includes all forms of computing, the internet, telecommunications, digital media and mobile phones. This policy is linked to the Bright World Guardianship Social Media Policy which outlines the guidelines for staff using social media for business and personal use, and to the Bright World Guardianships Information and Communications Technology policy which outlines the professional responsibility which staff members have when using any form of ICT.

9.2 Any member of the company personnel that uses illegal software or access inappropriate websites when on company premises faces dismissal.

9.3 Staff members must be aware of the principles of the Computer Misuse, Copyright and Data Protection Act 1998.



9.4 The use of the internet, web based or mobile communications and social media by staff members must be appropriate to the staff member's role, lawful, proportionate and ethical.

9.5 Staff members must access Bright World internal information for a legitimate and authorised purpose only, must not disclose internal information to unauthorised recipients and must maintain confidentiality of internal information.

9.6 The following list of offences will be considered as misconduct and will lead to a disciplinary review:

- abuse, misuse or neglect IT systems within the company
- misuse of the internet and/or email to access or distribute material of a pornographic, offensive, obscene or inappropriate nature
- excessive use of the internet for personal purposes during working time
- accessing information on Bright World internal systems for unauthorised purposes or persons
- accessing and disclosing information obtained from Bright world internal systems for unauthorised purposes or persons
- disclosure of confidential information for unauthorised purposes or persons

9.7 Staff members have a positive obligation to report any of their own behaviour which has fallen below the standards of professional behaviour in this policy

9.8 Staff members have a positive obligation to report, challenge or take actions against the conduct of colleagues which has fallen below the standards of professional behaviour in this policy.

10. Whistle Blowing Policy - Definition

10.1 Bright World believes whistle blowing to be the reporting of suspected wrongdoing in the workplace, in support of Bright World's commitment to safeguarding and promoting the welfare of children and young people. Bright World expects all staff (including self-employed consultants), partners and volunteers to share the commitment to the company's overall aim.

Bright World actively encourage all personnel, partners and volunteers to report any serious concerns they may have about any aspect of the company including such as:

- health and safety concerns
- damage to the work environment
- a criminal offence that has taken place or is about to take place
- disobeying the law
- the covering up of a wrong doing
- the conduct of its personnel or others acting on behalf of the company at work or representing the Company at external functions for work or pleasure
- discipline, grievance, harassment and bullying
- recruitment and selection of host families and taxi drivers





10.2 The aim of this policy is to:

- To encourage all Bright World staff to report any serious concerns about any aspect of the company or the conduct staff or others acting on behalf of the company
- To work with partners and schools and the relevant Local Authority to share good practice in order to improve this policy

10.3 Those wishing to make a disclosure may do so to any member of the team, a manager or supervisor, to the Senior Member Team or to an accredited body for example AEGIS or to the Local Authority.

We believe that where the concern relates to an individual's own employment Bright World's Grievance Policy must be used. However, if the concern relates to something which is against the company's policies, falls below standards of practice or amounts to improper conduct then the procedures in this policy must be used.

We are committed to the highest possible standards of openness, integrity and accountability.

We have a commitment to promote equality. Therefore, an equality impact assessment has been undertaken and we believe this policy is in line with the Equality Act 2010.

10.4 When a concern has been raised, the Managing Directors:

- Have a responsibility to ensure all staff are aware of and comply with this policy;
- will provide support for a member of staff who has raised a concern;
- will provide support for a member of staff against whom allegations have been made;
- must keep both parties informed of all progress during any investigation;
- will take no action against a member of staff if, after investigation, their concern has not been confirmed;
- will take disciplinary action if a concern is raised frivolously, maliciously or for personal gain;
- has responsibility for ensuring that the school complies with all equalities legislation;
- has responsibility for ensuring funding is in place to support this policy;
- has responsibility for ensuring this policy and all policies are maintained and updated regularly;
- has responsibility for ensuring all policies are made available to parents, schools and partners;
- has responsibility for the effective implementation, monitoring and evaluation of this policy

When a concern has been raised, members of the Senior Management Team will:

- ensure all staff and volunteers are aware of and comply with this policy;
- encourage all staff and volunteers to raise any concerns they have regarding actual or potential breaches of duty or a failure by the company;
- provide support for a member of staff who has raised a concern;
- provide support for a member of staff against whom allegations have been made;
- keep both parties informed of all progress during any investigation;
- work closely with the Managing Directors;
- provide leadership and vision in respect of equality;
- provide guidance, support and training to all staff;
- monitor the effectiveness of this policy;
- annually report to the Managing Directors on the success and development of this policy. right World staff have a duty to speak out against and report any:
- criminal offence that has been committed, is being committed or is about to be committed;





- person who has failed, is failing or is about to fail compliance with any legal obligation that they are subject to;
- miscarriage of justice that has occurred, is occurring or is likely to occur;
- health and safety issue that has endangered, is endangering or is likely to endanger any person;
- damage to the work environment that has been committed, is being committed or is about to be committed

10.5 Any Bright World member of staff, who speak out against and report any of the above, will receive support from the Managing Directors. Bright World will not tolerate any harassment or victimisation of member of staff who speaks out against and reports any of the above. Such behaviour will be treated as a serious disciplinary offence, which will be dealt with under the [Disciplinary Rules and Procedure](#).

The Senior Management Team will give support to any member of staff against whom allegations have been made.

10.6 If the concern is about senior personnel in Bright World, an external contact (such as below) may be required to help you proceed. Expolink:<http://expolink.co.uk/whistleblowing/whistleblowing-hotline-service/>

10.7 All raised concerns are investigated and every effort is made to ensure confidentiality for all parties:

Stage 1

- All concerns should be made in person or in writing.
- The person raising the concern may wish to receive help from another member of the team or Senior Management Team, or external support
- At any future meeting the employee may be accompanied by a colleague or an external supporter if the selection of the external support is considered appropriate by the Managing Directors. If not, the staff member will be asked to select an alternative representative

Stage 2

- Within 10 working days the person with whom the concern has been registered acknowledges receipt in writing.
- The letter will state the following:
 - How the concern will be dealt with;
 - How long it will take to provide a final response;
 - Information on employee support services.

Stage 3

- After initial enquiries have been conducted, a decision will be made if an investigation should take place under the Bright World Disciplinary Rules and Procedure.
- After initial enquiries have been conducted, any false allegations will be considered for investigation under the Bright World Disciplinary Rules and Procedure
- The investigation will be either:



- an internal investigation;
- a referral to the police;
- a referral to AEGIS;
- an external independent enquiry.

Stage 4

- The employee will be informed in writing of the outcome of the investigation by the Managing Directors.
- The employee has the right to take their concern to an independent body if they feel it has not been addressed adequately.

10.8 The NSPCC Whistleblowing number is 0800 028 0285.

10.9 Awareness of this policy is raised through company handbooks and other publications, the company website, the Staff Manuals and newsletters and briefings

11. Information Sharing

11.1 Bright World recognises that keeping children safe from harm requires the early, effective sharing of information and is a vital element of safeguarding and child protection, as per Working Together To Safeguard Children 2015:

“Effective sharing of information between professionals and local agencies is essential for effective identification, assessment and service provision”

11.2 Bright World recognises the need for confidentiality of their student, school, Host Family, staff and transfer company records and works in adherence to the Data Protection Act. (Refer to Confidentiality and Data Protection Policy - Bright World Policy Manual)

11.3 In cases where a child is believed to have been put at risk or is likely to be put at risk of harm, staff will use their professional judgement when making decisions on what information to share and when. As per HM Government Information Sharing Advice for Safeguarding Practitioners 2015, “The Data Protection Act 1998 and human rights law are not barriers to justified information sharing, but a framework to ensure that personal information about living individuals is shared appropriately”.

11.4 Bright World company procedures should be followed and staff should consult with their manager if in doubt. Such decisions on disclosure should be proportionate to the extent of the harm that a child may be or has been exposed to (Refer to Privacy Policy Bright World Policies Manual). Where any doubt exists about sharing the information concerned, advice will be sought from other practitioners without disclosing the identity of the individual where possible.

11.5 Bright World will be open and honest with the individual (and/or family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

11.6 Bright World will share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. Bright World understands that information can still be shared without consent if, in our judgement (based on facts), there is good reason to do so, such as where safety may be at risk. When sharing or requesting personal information from



someone, Bright World staff will be aware of the basis upon which they are doing so. Where Bright World have consent to share information, staff are mindful that an individual might not expect information to be shared.

11.7 Bright World considers safety and well-being of the individual and others who may be affected, when forming information sharing decisions.

11.8 Bright World will only share information which is necessary for the purpose for which the information is being shared, will share information only with those individuals who need to have the information, will ensure the information is accurate, current and is shared in a secure and timely fashion.

12. Confidentiality, Data Protection and Privacy Policy

12.1 Bright World Guardianships staff have access to personal confidential information about students, their families, and staff members. This information is stored and processed in accordance with the Data Protection Act 1998. The principles of this Act are considered when sharing confidential information when legally permissible and when in the interests of the child. Bright World adhere to the principles of the Act which are to ensure that the information is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- handled according to people's data protection rights
- kept safe and secure

12.2 Bright World Guardianships will only share records with those who have a legitimate professional need to see them. Staff should never use confidential or personal information about a pupil or her/his family for their own, or others advantage (including that of partners, friends, relatives or other organisations). Information must never be used to intimidate, humiliate, or embarrass the child.

12.3 Confidential information should never be used casually in conversation or shared with any person other than on a need-to-know basis.

12.4 In circumstances where the pupil's identity does not need to be disclosed the information should be used anonymously. There are some circumstances in which a member of staff may be expected to share information about a pupil, for example when abuse is alleged or suspected. In such cases, individuals have a responsibility to pass information on without delay, but only to those with designated safeguarding responsibilities.



12.5 If a child - or their parent / carer - makes a disclosure regarding abuse or neglect, the member of staff should follow the setting's procedures. This means that staff:

- need to know the name of their Designated Safeguarding Lead and be familiar with LSCB child protection procedures and guidance:
- are expected to treat information they receive about pupils and families in a discreet and confidential manner
- should seek advice from a senior member of staff (designated safeguarding lead) if they are in any doubt about sharing information they hold or which has been requested of them
- need to be clear about when information can/ must be shared and in what circumstances
- need to know the procedures for responding to allegations against staff and to whom any concerns or allegations should be reported & need to ensure that where personal information is recorded using modern technologies that systems and devices are kept secure 2 Sexual Offences Act 2003 8 should not promise confidentiality to a child or parent, but should give reassurance that the information will be treated sensitively.

12.6 If a member of staff is in any doubt about whether to share information or keep it confidential he or she should seek guidance from the Designated Safeguarding Lead. Any media or legal enquiries should be passed to senior management

12.7 Enquiries or complaints in relation to misuse of data should be directed to Claire Taylor, Director of Safeguarding and Operations. If further advice needs to be sought, contact can be made with Information Commissioner's Office (ICO) - ICO Helpline Telephone 0303 123 1113. The ICO can investigate claims and take action against anyone who's misused personal data (<https://ico.org.uk/concerns/>)

13. Bright World Staff and Enhanced Disclosure and Barring Service (DBS) Checks

13.1 Bright World conducts an enhanced DBS checks for their head office staff, Local Coordinators and host families (who are classed as volunteers). This DBS check along with registration to the Disclosure and Barring Service Update Service is a fundamental requirement of becoming and remaining one of these staff members for Bright World. There are three types of checks: standard, enhanced and enhanced for people working in regulated activity with children for example teachers and social workers. The enhanced DBS check includes a check of the Police National Computer Records (PNC) plus other information held by the police that is considered relevant by the police force.

13.2 Bright World does not conduct its own checks for our suppliers though does require sight of an original and valid enhanced DBS certificate before we utilise their service. Details of these checks are recorded securely on IBOS. The database is only accessible by accredited Head Office staff members with a username and password and information is protected by Bright World Guardianships compliance with the Data Protection Act (1998).

13.3 Bright World collects the following information about staff members (i.e. Head Office staff, Local Coordinators, host families) in the following ways:

Staff members are asked to submit an application form for an enhanced DBS certificate. For host families this includes every member of your household who is aged 16 years and over. This application will be made to the DBS (Disclosure and Barring Service) via an online disclosure system. The DBS helps employers make



'Safer Recruitment' decisions and prevents unsuitable people from working with vulnerable groups including children. The DBS replaces the Criminal Records bureau (CRB) and Independent Safeguarding Authority (ISA).

- On receipt of an application, UCheck will require the applicant to provide personal details. UCheck provide a range of vetting and screening services for employers and employees including the administrative process for DBS checks.
- For host family applications to UCheck, a Bright World representative will inspect their original documents to confirm identity. Once the Bright World representative has sighted and verified the documents, the details of these identification sources will be logged onto UCheck. In some circumstances when this is not possible they will be asked to fill out a paper form to collect these details.
- Bright World will ask applicants whether they have already subscribed to the DBS Update Service and if the answer is yes, then Bright World will request they provide their Update Service ID. The Disclosure and Barring Service Update Service allows applicants and employers to conduct future checks to be carried out to confirm that no new information has been added to the certificate since the date of issue. This allows for portability of a certificate across employers.

13.4 Bright World needs this information so that they can conduct an enhanced criminal record for their prospective staff members and suppliers. Bright World use UCheck to facilitate this process as they provide a quick and reliable service that is an alternative to the standard paper forms therefore allowing us to complete an application at any location with internet access. This check is relevant as the applicant is seeking a role in the child workforce and will assist Bright World in making safer recruitment decisions.

Once an applicant's DBS certificate has been received we will register them online for the DBS update service on a yearly subscription basis, allowing us to regularly re-check their certificate status online. If an applicant has already subscribed to UCheck, we will use their current update number to continue to manage their subscription.

13.5 UCheck are a certified umbrella body of the DBS who provide their own statement of fair processing. When an applicant supplies personal information to their site, they have legal obligations in the way they deal with your data. (<https://www.UCheck.co.uk/>)

Bright World Guardianships has a legal obligation to abide by the Data Protection Act 1998 and as part of this, they must provide a policy for secure storage, handling, use, retention and disposal of Disclosures and Disclosure information which is outlined below:

13.6 Bright World policy for handling of DBS certificate information

- Once the email with the UCheck result has been sent to the Host Family Recruitment Manager (HFRM) and only if the result is clear, the HFRM logs on to the government update service website and signs that person up for the automatic Update Service. If the DBS check is returned with a conviction marker
- the HFRM forwards this to the Director of Safeguarding (DSO) to make an informed decision as to whether the Host Family will be used. The DSO can obtain a copy of the certificate from the named person to further assess the applicant's suitability for hosting.
- Only authorised members of staff have access to our UCheck disclosure account where there are applications that are processing or completed. UCheck will automatically archive certificates 6 months after their issue date according to DBS guidelines.



13.7 The appointed lead for questions, concerns or complaints about the way in which Bright World conduct their criminal record checks is the Director of Safeguarding, Claire Taylor, on ctaylor@brightworld.co.uk (Refer to Complaints Policy - Operations Manual)

14. Welfare, Health and Safety

14.1 The Workplace (Health, Safety and Welfare) Regulations 1992 cover a wide range of basic health, safety and welfare issues and apply to Bright World Guardianships as a workplace.

14.2 Bright World Guardianships takes their duty under the Health and Safety at Work Act 1974 seriously to ensure, so far as reasonably practicable, the health, safety and welfare of their employees at work.

14.3 The lead for health, safety and welfare is James Foster, Commercial Director.

14.4 Bright World Guardianships has a Health and Safety Policy which outlines the roles, risks and emergency procedures to follow. The policy is included in the Bright World Guardianships Staff Handbook.

14.5 The policy is reviewed annually by James Foster.

15. Complaints

15.1 Bright World Guardianships has a 'Complaints Policy and Procedure' as we recognise that there may be legitimate concerns from students, parents, agents host families or transfer companies about the service we provide. As a company we encourage these concerns being made known to Bright World staff so that they can be addressed in partnership with us, and we can continuously improve our service.

15.2 Bright World Guardianships has an internal complaints policy and procedure for staff who have complaints and these are detailed in the Staff Handbook.

15.3 If complainants are not satisfied with the outcome as decided by Bright World, they can contact AEGIS to report their concerns if they wish to do so (as detailed in the Complaints Policy). The relevant contact details are set out below:

Yasemin Wigglesworth
Executive Officer,
Association for the Education and Guardianship of International Students (AEGIS)
The Wheelhouse,
Bond's Mill Estate,
Bristol Road,
Stonehouse,
Gloucestershire,
GL10 3RF
+44 (0) 1453 821293

www.aegisuk.net





Bright World Guardianships Ltd

Policy & Procedure

