

# Accreditation Handbook and Guardianship Organisation Quality Standards



September 2021



# AEGIS

# Contents

Contents	1
Introduction to AEGIS	4
Inspection and Accreditation leading to AEGIS Membership	4
AEGIS - Aims and Objectives	8
AEGIS Code of Practice	9
Definitions	10
Introduction to the AEGIS Quality Standards	12
The AEGIS Guardianship Organisation Quality Standards	13
1 Statement of company aims, principles and practice	13
2 Management of the Guardianship Organisation	14
2.1 Staff, Volunteers and Homestays	14
2.2 Contracts	15
2.3 Handbooks	15
2.4 Insurance	15
2.5 Record Keeping	16
2.6 Emergency Procedures	16
2.7 Information Sharing and Data Protection	16
2.8 Safer Recruitment	17
2.9 Finance	19
2.10 Policies	19
3 Pre-Arrival Support	20
4 Student Induction	21
5 Travel Arrangements	22
6 Homestays	23
6.1 Checks	23
6.2 Information	23
6.3 Homestay Profile	23
6.4 Availability of Homestays	24
6.5 Student Accommodation	24
6.6 Meals	25
6.7 Laundry	25
6.8 Guidelines on conduct when hosting a student	25
6.9 Annual Training	26

6.10	Health and Safety & Annual Visit	26
6.11	Visits and Inspections	27
6.12	Using a Third-Party Homestay Provider	28
7	Student Folder	29
8	Safeguarding, Child Protection and Welfare	30
8.1	Safeguarding & Child Protection Policy	30
8.2	Designated Safeguarding Lead (DSL)	30
8.3	Safeguarding Training	31
8.4	Whistleblowing	31
8.5	Allegations and Low-Level Concerns	31
8.6	Anti-Radicalisation – Prevent Duty	32
8.7	Missing Students	32
8.8	Student Behaviour	33
8.9	Anti-Bullying including Cyberbullying	33
8.10	Online Safety	34
9	Complaints	35
10	Day Students, Prolonged Stays with Hosts and Private Fostering	36
11	Liaison with Partner Schools	37
	Appendix A	38
	Preliminary Accreditation Essential Documents and Evidence for Submission	38
	Appendix 1	40
	Content for a Student Handbook	40
	Appendix 2	42
	Content for a Parent Handbook	42
	Appendix 3	44
	Content for a Homestay Handbook	44
	Appendix 4	46
	Minimum content for a Safeguarding Policy	46
	Appendix 5	49
	Suggested wording for the Homestay Self-Declaration	49
	Appendix 6	51
	Suggested content for a Staff and Homestay Code of Conduct	51
	Appendix 7	53
	Sample Single Central Record for Safer Recruitment Checks	53

Appendix 8	54
AEGIS Grievance Procedure	54
Appendix 9	56
Example Permission to Travel Letter	56

# Introduction to AEGIS

The Association for the Education and Guardianship of International Students (AEGIS) is the authoritative association for inspecting and accrediting guardianship organisations throughout the UK. With the high numbers of international students studying at schools and colleges, within the independent and maintained sectors, both as day and boarding students, and at universities, an accrediting body to monitor the hosting and guardianship of international students is considered necessary. An international student studying in the UK deserves the highest standards of care and understanding and there are many duties to be considered.

This accreditation Handbook and Guardianship Organisation Quality Standards document, provides details of the necessary information required to prepare for inspection. Accreditation is awarded if requirements are fully met. Please note that whilst some standards may not be legal requirements, they are AEGIS requirements and it is necessary to meet all standards (unless not relevant e.g. private fostering) in order to gain AEGIS (re)accreditation. AEGIS seeks advice from safeguarding and legal experts in the writing of the standards.

The importance of organisational culture is acknowledged in the statutory guidance *Working Together to Safeguard Children*<sup>1</sup>. AEGIS expects guardianship organisations to have a culture of safety, equality and protection.

All prospective members are respectfully reminded that AEGIS expects any communication with AEGIS staff and inspectors to be polite, professional and courteous at all times.

## Inspection and Accreditation leading to AEGIS Membership

There are two levels of AEGIS accreditation – Preliminary and Gold Standard.

If a guardianship organisation feels that they require help in order to prepare for AEGIS inspection, they should contact the AEGIS office who can offer a consultancy service with a lead inspector at an additional cost.

### Preliminary Accreditation

Preliminary Accreditation is open to all guardianship organisations or sole guardians of any size. Guardians can even apply before they recruit students. This level ensures that the essential standards are in place in order to provide safe guardianship.

---

<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779401/Working\\_Together\\_to\\_Safeguard-Children.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf)

Preliminary Accreditation involves scrutiny of documents, policies and safer recruitment checks. Appendix A (page 37) lists all the essential documents, requirements and evidence needed for this level. Once compiled, this should be submitted to the AEGIS office in a digital format. If required, template policies are available at a fee from the AEGIS office.

Please note that at this stage AEGIS will ask permission to view the DBS certificates of the owner/director/s of the guardianship. Permission will be sought from the owner of the certificate directly.

If there are any gaps or areas where it is felt that information does not meet the requirements, further information will be requested.

Once evidence has been examined, there will be a video interview with the AEGIS Head of Inspections to talk through the evidence. This is an ideal opportunity for both parties to ask any questions they may have. It is a requirement that the guardianship organisation is able to demonstrate knowledge of the AEGIS Code of Practice.

If all requirements are successfully met, Preliminary Accreditation status will be awarded, valid for two years. During the two years it is hoped that the guardianship organisation will progress to Gold Standard Accreditation. Alternatively, they may wish to remain at Preliminary level and renew after two years.

### **Initial Gold Standard Accreditation**

Gold Standard Accreditation is the most prestigious accolade that a guardianship organisation can hold. It is recognised by UK schools, colleges and universities and by parents and agents overseas as the benchmark for the highest standards of safeguarding and care in the guardianship of international students.

Guardianship organisations who have successfully gained preliminary accreditation within the last two years and had a minimum of 3 students under their care for two terms are able to apply for Gold Standard Accreditation. However, guardianship organisations who do not meet this requirement should contact the AEGIS office for further details about how to proceed. The inspection process is based on the AEGIS Quality Standards and a guardianship organisation must meet all of the applicable standards in order to gain Gold Standard Accreditation. Inspections are carried out by independent, trained inspectors.

On receipt of the application from the guardianship organisation, the AEGIS office will appoint an independent lead inspector who will contact the representative from the guardianship organisation to discuss which of the Quality Standards are relevant to their model of guardianship, how the documents will be shared and a timescale for the forthcoming inspection.

The guardianship organisation will be asked to submit to the AEGIS office a copy of the contact details for all their homestays and partner schools using provided templates. This data is held securely and only shared with the inspections manager and the appointed inspectors. All data is fully deleted once the inspection process has finished. It is the responsibility of the guardianship organisation to secure permission from the individuals, prior to supplying this information to AEGIS.

The supporting inspector will interview selected school staff, students and homestays. Interviews with school staff and students may be carried out remotely. In addition, the AEGIS office will provide a web link to questionnaires for parents, homestays, students and schools which the

guardianship organisation will be required to forward to the full list of their respective contact groups.

For those guardianship organisations that operate a system of local coordinators, the supporting inspector may wish to interview a selection of coordinators remotely.

Following the interviews and questionnaires, the lead inspector will contact the guardianship organisation to arrange a suitable date for an on-site or remote visit to conclude the inspection.

The guardianship organisation will be expected to have evidence available to demonstrate their ability to meet all of the AEGIS Quality Standards which apply to their model of guardianship. The lead inspector will work through this with representatives from the guardianship organisation. All senior managers, including the designated safeguarding lead, must be present for at least an agreed part of this visit/call.

The lead inspector will also give feedback on the findings from the interviews and the questionnaires. Any queries or concerns that have emerged from this process will be discussed with the guardianship organisation at this time.

The lead inspector will provide a detailed inspection report, with recommendations and deadlines, where appropriate. This report will recommend to the AEGIS Trustees either that the guardianship organisation should be accredited, or if not, state the reasons why accreditation is not judged to be appropriate at this stage. The decision to grant accreditation rests solely with the AEGIS Board of Trustees, whose decision is final.

Providing the guardianship organisation meets each of the applicable Guardianship Organisation Quality Standards, they will become a Gold Standard accredited member of AEGIS for the next four years.

### **Re-Accreditation and continued membership of AEGIS**

A condition of continued membership of AEGIS is that every accredited guardianship organisation be re-inspected. This will happen every two years for preliminary members and every four years for gold standard members, thereby ensuring compliance with current statutory requirements and guidance.

The AEGIS office will notify the accredited member guardianship organisation of its need for re-inspection six months before the anniversary of the last accreditation date, with a view to having completed the re-inspection by the anniversary date.

Re-inspection involves Preliminary and Gold Standard requirements combining scrutiny of documentation, interviews with selected students, schools and homestays and questionnaires to parents, students, schools and homestays by supporting inspector(s), and one on-site visit/video call by the lead inspector.

### **Annual Declaration (Preliminary and Gold Standard Members)**

An Annual Declaration form must be completed by AEGIS members. This provides AEGIS with up-to-date information and includes a declaration asking the guardianship organisation to

confirm that all staff, homestays, and volunteers have had a valid DBS check. The declaration also asks guardianship organisations to provide student statistics.

# AEGIS - Aims and Objectives

## Aims

- To ensure to the greatest extent possible that a guardianship organisation meets the requirements of current safeguarding and child protection legislation in relation to the care of international students studying in the UK.
- To ensure that the highest standards of care, safety and supervision in respect of the pastoral, social, cultural and educational welfare of international students are maintained by the guardianship organisation.

## Objectives

- To promote the highest possible standards of care through a rigorous inspection and accreditation process.
- To provide a code of practice and protocols to which its members are expected to adhere.
- To offer support, guidance, preparation and relevant training to guardianship organisations seeking accreditation.
- To operate a system of regular re-inspection, every four years for Gold accredited members and every two years for Preliminary accredited members.
- To make accessible to its members, via the AEGIS website, newsletter and AEGIS office, support, guidance and up-to-date information.
- To provide networking opportunities through events and workshops.

# AEGIS Code of Practice

- To promote and provide best and legal practice in the guardianship and hosting of all international students at schools/colleges/universities, particularly those under 18 years of age.
- To respect and support the rights, religion and customs of the international student.
- To uphold the stated ethos and values of the student's school at all times.
- To comply with the 1989 & 2004 Children Act and meet the requirements of the most recent versions of the Department for Education *Working Together to Safeguard Children*<sup>2</sup> and *Keeping Children Safe in Education*<sup>3</sup> guidance.
- To comply with the Safeguarding Vulnerable Groups Act 2006 and/or Children (Private Arrangements for Fostering) Regulations 2005.
- To ensure all international students have 24 hour emergency contact with a responsible adult in the UK.
- To put in place arrangements which maintain appropriate contact with the international student, the overseas parent and the homestay and to ensure all appropriate records are up to date.
- To provide both pastoral and educational support as outlined in any literature and agreements.
- To adhere to the AEGIS grievance procedure<sup>4</sup>.
- To have appropriate insurance for guardianship arrangements and to comply with UK legislation.
- To ensure that the AEGIS annual membership fee is paid in a timely manner, by the end of the first academic term.
- To respect the business practices of others and uphold strong business ethics.
- To be prepared to undergo re-accreditation every two/four years, depending on the level of accreditation held.
- To inform AEGIS as soon as possible if they are subject to any complaints or investigations that may cause reputational damage to AEGIS.

---

<sup>2</sup> See footnote 1 above.

<sup>3</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/912592/Keeping\\_children\\_safe\\_in\\_education\\_Sep\\_2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912592/Keeping_children_safe_in_education_Sep_2020.pdf)

<sup>4</sup><https://aegisuk.net/app/uploads/2019/09/AEGIS-Grievance-Procedure-2019.pdf>

# Definitions

For the purposes of clarity, the following terms are used throughout all AEGIS documentation.

**Agent** – An educational agent refers to an individual or organisation that offer advisory services to students and their parents, such as school placements, in exchange for a fee paid by the family and/or commission paid by the educational institute they represent.

**Advisory** – A point that is recommended by AEGIS. However, it is not a required standard to be met.

**Biometric Residence Permit (BRP)** – Issued when a visa or immigration application for more than 6 months is approved.

**Closed Circuit Television (CCTV)** - A self-contained surveillance system comprising cameras, recorders and displays for monitoring activities.

**Designated Safeguarding Lead (DSL)** - The role of the Designated Safeguarding Person was specified in the Children Act 2004 and ensured that every organisation had a “named person” for safeguarding children and young people.

**Disclosure and Barring Service (DBS) Check** - helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. The DBS is a non-departmental public body of the Home Office which focuses on safeguarding and a large part of its role is to process DBS checks which result in a certificate being issued which will flag any potential safeguarding issues recorded, depending on the level of check requested.

**Educational Guardian** - designated person who acts with delegated parental responsibility and has overarching pastoral and academic responsibility for the safeguarding, care and welfare of the student while they attend school or college in the UK. Responsibilities may include being authorised to make certain decisions regarding emergency medical and dental treatment and matters of a disciplinary nature. Please note that an educational guardian is not a legal guardian.

**Exeat** - designated weekend leave or period of absence from a boarding school.

**Guardianship Organisation (GO)** - an organisation which provides the service of educational guardianship for international students. The organisation may also be responsible for arranging accommodation for its students at an approved homestay.

**Homestay** - a household approved and appointed, following a rigorous safer recruitment process, undertaken by the guardianship organisation, to provide accommodation for, and care of a student at weekends, exeats, half-terms or at the beginning or end of term or in the case of day students during school term times.

**Information Commissioner’s Office (ICO)** – The UK authority which upholds information rights in the public interest.

**Lead Inspector** - the lead inspector has overall responsibility for the inspection of the guardianship organisation, liaising with the AEGIS head of inspections. The lead inspector scrutinises the policies and all other documentation prepared by the guardianship organisation and assesses their implementation. Based on additional evidence gathered by the supporting inspector, the lead inspector provides a detailed inspection report, with recommendations whether to accredit or re-accredit the guardianship organisation, to the trustees.

**Legal Guardian** - the technical meaning of legal guardian refers to a person who is appointed by a court to care for a child because, for example, the child's parent or guardian has died. Legal guardian can also signify a person acting as a testamentary guardian or a guardian of a child's estate.

**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 officer of police for the area.

**Parent** - an overseas parent who appoints a guardianship organisation to act in loco parentis for his or her child/children while studying in either a day/boarding school or college/university in the UK.

**Primary Carer** - person in homestay with overall responsibility for the international student while staying with the homestay.

**Protecting Vulnerable Groups (PVG) Checks** – Disclosure Scotland carries out PVG checks to ensure Scottish residents whose behaviour makes them unsuitable to work with children and/or protected adults, cannot carry out '[regulated work](#)' with these vulnerable groups. As with DBS checks, a certificate is issued containing information about the individual to assist with determining their suitability for a role, including relating to their criminal records and whether or not they are on a barred list for regulated work.

**Student** - an overseas student who is either a day student or full or weekly boarder in a school or college university, either independent or maintained, in the UK.

**Supporting Inspector** - the supporting inspector works closely with the lead inspector and submits a detailed report to the lead inspector based on his/her findings following visits to, and interviews with school staff, overseas students and homestays and in his/her analysis of results of questionnaires sent to overseas parents and those schools and homestays not visited.

# Introduction to the AEGIS Quality Standards

AEGIS recognises that every guardianship organisation operates in a different way from others, with many offering specialisms in particular sectors.

The following eleven AEGIS Quality Standards are designed to cover the areas in which guardianship organisations operate. It is recognised that some guardianship organisations may not offer particular aspects covered by some of the standards. AEGIS inspectors will consider the business model adopted by each guardianship organisation and inspect accordingly. For example, some guardianship organisations may not provide a service for day pupils or private fostering so Standard 10 will not be applicable or inspected. Likewise, some standards may only partly apply. For instance, guardianship organisations who only offer a basic level of service may not be required by parents to keep in regular contact with schools. In this case only parts of Standard 11 will be applicable. Please note that guardianship organisations who do not regularly provide homestay accommodation (standard 6) or transport services (standard 5) will be required to show that there are suitable arrangements in place to care for students in an emergency situation when they cannot be at school.

Different guardianship models may include:

- Guardianship organisations that offer boarding style accommodation where several students are cared for by on-site staff.
- Homestays with large houses who may easily accommodate more than 4 students at any time.
- Educational guardians who care for all of their students (4+) themselves in a sufficiently large home to accommodate their needs.

AEGIS recognises that such organisations can still offer high levels of care and will consider accreditation and membership of such guardianship organisations.

In order to be granted/ retain AEGIS accreditation, guardianship organisations who are offering an alternative model of hosting must agree to have the accommodation inspected by an AEGIS inspector either at the time of accreditation (new members) or before hosting students in the accommodation (existing members).

Guardianship organisations who offer accommodation for multiple occupancy as outlined above should contact the AEGIS office to request a copy of separate requirements. All other standards will still apply in the usual way.

# The AEGIS Guardianship Organisation Quality Standards

## 1 Statement of company aims, principles and practice

- 1.1 The guardianship organisation is required to provide a statement of their aims, principles and practice which should be available to all staff, parents / agents, volunteers, students and homestays.
- 1.2 The guardianship organisation is to ensure that all publicity and information is accurate, conveying realistic expectations of the level of service and accommodation offered.

## 2 Management of the Guardianship Organisation

### 2.1 Staff, Volunteers and Homestays

- 2.1.1 The guardianship organisation is required to identify all those involved with the guardianship organisation and their particular roles.
- 2.1.2 The guardianship organisation is required to provide clear job descriptions to all staff, volunteers, local coordinators (if any) and homestays clearly stating their responsibilities and reporting line. These job descriptions should also include reference to their safeguarding responsibilities.
- 2.1.3 The guardianship organisation is required to provide all new staff, volunteers and homestays with a suitable induction procedure which must cover adequate safeguarding training (See standard 8.3 Safeguarding Training).
- 2.1.4 Safer recruitment checks, to include DBS details, ID checks, right to work in the UK, references and interview notes for all appointments of staff, volunteers and homestays (see standards 2.8 Safer Recruitment and 6.1 Checks) are required.
- 2.1.5 The guardianship organisation is required to produce suitable guidelines for staff on the behaviour that it expects. A suggested list of content for such a code of conduct can be found in Appendix 6.
- 2.1.6 AEGIS members who operate in Scotland are required to pay due regard to the requirements of the Scottish Care Inspectorate. Please note that the Scottish regulations apply to all guardianship organisations who provide accommodation / guardianship for students in Scotland, regardless of where the organisation is based.
- 2.1.7 All guardianship organisations should be aware that any homestays in Scotland that are providing care for reward will be required to register as a childminder with the Scottish Care Inspectorate. The exception being when '*the arrangement is not for reward other than reimbursement of any reasonable and necessary expenses that the guardian has incurred.*' Additionally, any guardianship organisation that employs homestays that are providing care for reward may need to register as a Child Care Agency. AEGIS recommends that contact is made with the Scottish Care Inspectorate to determine what is required for individual organisations. (The Care Inspectorate contact centre telephone: 0345 600 9527)<sup>5</sup>

**Advisory:** It is advisable that guardianship organisations ask all their employees, volunteers and homestay primary carers to complete a medical declaration.

---

<sup>5</sup> Scottish members should refer to <http://www.careinspectorate.com/images/documents/176/Guidance-on-regulation-of-guardianship-arrangements-in-boardingschools.pdf>

## 2.2 Contracts

- 2.2.1 The guardianship organisation is required to provide all paid staff with a contract of employment.
- 2.2.2 The guardianship organisation is required to provide all parents / agents with a clear contract.
- 2.2.3 The guardianship organisation is required to provide each homestay with a clear contract.
- 2.2.4 The guardianship organisation is required to provide any educational agents that they work with either in the UK or overseas with a clear contract.

**Advisory:** AEGIS strongly advises that guardianship organisations take legal advice as to the content of contracts.

## 2.3 Handbooks

- 2.3.1 The guardianship organisation is required to produce a suitable handbook for students, which should be written in an age-appropriate style (see Appendix 1 for minimum details to be included).
- 2.3.2 The guardianship organisation is required to produce a suitable handbook for parents and agents (where appropriate) (see Appendix 2 for minimum details to be included).
- 2.3.3 The guardianship organisation is required to produce a suitable handbook for homestays (see Appendix 3 for minimum details to be included).

## 2.4 Insurance

- 2.4.1 The guardianship organisation is required to have up-to-date professional indemnity and public liability insurance in place sufficient to cover the scope of the guardianship organisation's business, and employer's liability insurance where applicable.<sup>6</sup>
- 2.4.2 The guardianship organisation is required to have a process for checking that all homestays are aware of the need to ascertain the adequacy of their home insurance in respect of hosting international students. The guardianship organisation must inform the homestay that the insured (homeowner) should declare all facts to the insurer in order to a) obtain the right cover and b) obtain the right premium.
- 2.4.3 Where the homestay also provides transport using their car for the students in their care, then the guardianship organisation must make homestays aware of the need

---

<sup>6</sup> The AEGIS office is happy to supply the details for of insurance companies who have worked successfully with other member GOs.

for adequate comprehensive vehicle insurance and to inform their insurers that they will be using their car to provide transport to international students, for which they may be paid or receive expenses.

## 2.5 Record Keeping

- 2.5.1 The guardianship organisation is required to have a secure and efficient method for holding records.

## 2.6 Emergency Procedures

- 2.6.1 The guardianship organisation is required to provide all students, parents, staff, volunteers, homestays and partner schools with a 24 hour emergency contact number which should connect them to a suitable member of staff who will have the necessary experience and access to any records to assist with their enquires.
- 2.6.2 The guardianship organisation is required to have an emergency plan in place to show how they would deal with any reasonably foreseeable emergency situations e.g. health pandemic, missing student, death of a student, emergency cover for sole guardians when unable to fulfil duties etc.
- 2.6.3 The guardianship organisation is required to have a plan in place for any student who cannot be accommodated by the school due to illness, disciplinary action or any other cause. This plan must demonstrate who would be responsible for the student and what action would be taken.

## 2.7 Information Sharing and Data Protection

- 2.7.1 The guardianship organisation is required to share information appropriately with parents, students, agents, homestays, schools, local children's services and other external agencies where there is a need to do so.
- 2.7.2 The guardianship organisation is required to be registered with the Information Commissioner's Office (ICO) and to appoint a data controller.<sup>7</sup>
- 2.7.3 The guardianship organisation is required to have a suitable data protection policy and privacy notice, in line with ICO requirements. These should be made available to all parents, agents, homestays and schools.<sup>8</sup>
- 2.7.4 The guardianship organisation is required to ensure that all records are kept securely and can only be accessed by those people who need to see the information, in line with data protection requirements<sup>9</sup>. They should make staff and

---

<sup>7</sup> <https://ico.org.uk/for-organisations/register/>

<sup>8</sup> <https://www.gov.uk/data-protection/the-data-protection-act>

<sup>9</sup> See the ICO guidance at <https://ico.org.uk/for-organisations/guide-to-data-protection/>

homestays aware of the need to keep records securely in line with their published procedures.

- 2.7.5 The guardianship organisation is required to have the necessary consent and safeguards in place before using any photographs of students in publicity materials or on their website.<sup>10</sup>
- 2.7.6 **It is the responsibility of the guardianship organisation to secure permission from individuals, prior to supplying contact details to AEGIS as part of the accreditation process.** It is strongly suggested that the guardianship organisation includes the need to share contact details with the AEGIS office and lead and supporting inspectors for the purposes of a (re)accreditation inspection within their privacy notice and data protection policy, with the relevant permissions and in line with the ICO data protection principles. If not, the guardianship organisation must be able to demonstrate to the lead inspector how they have sought permission from the relevant parties.

## 2.8 Safer Recruitment

- 2.8.1 The guardianship organisation is required to have a safer recruitment policy.<sup>11</sup>
- 2.8.2 The guardianship organisation is required to demonstrate that they have complied with safer recruitment guidance (as detailed in the most recent version of *Keeping Children Safe in Education*<sup>12</sup>) when appointing new staff, volunteers and homestays.
- 2.8.3 At least one member of staff involved in any interview panel should have received safer recruitment training from a recognised provider. This can be completed online or face to face, and as best practice it is advised that this should be refreshed regularly.<sup>13</sup>
- 2.8.4 Detailed notes must be kept of all staff and homestay interviews. (See standard 2.5 Record Keeping).References are an important part of safer recruitment. They should be fit for purpose and relate to caring for children. The guardianship organisation is required to request and follow up on two written references from people who have known the candidate for a minimum of two years. For staff and/or volunteers, one of these references should be from the current or most recent employer. If this is their first job, at least one reference should be from a professional person. Referees may not be related to the employee. For homestays, at least one of these references should ideally be from a professional person and referees may not be related to the primary carer. Once the references have been received, the guardianship organisation is required to verify the source of the reference. If concerns are raised within the reference, the guardianship organisation is required to address these by telephoning the referee, so any further questions can be asked. A log of the call should be placed on file. The references should be retained on file for the duration of contract/employment and then an

---

<sup>10</sup> <https://www.nspcc.org.uk/preventing-abuse/safeguarding/photography-sharing-images-guidance/>

<sup>11</sup> <https://safeguardingtool.nspcc.org.uk/resource-library/resources/safer-staff-and-volunteers/>

<sup>12</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/101405/7/KCSIE\\_2021\\_September.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/101405/7/KCSIE_2021_September.pdf)

<sup>13</sup> <https://www.nspcc.org.uk/what-you-can-do/get-expert-training/safer-recruitment-training>

agreed period of time afterward, normally 5 -7 years. The guardianship organisation is required to check that information provided in references is not contradictory or incomplete. On receipt, references should be checked to ensure that all specific questions have been answered satisfactorily. The referee should be contacted to provide further clarification as appropriate, for example if the answers are vague or if insufficient information is provided. They should also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies should be taken up with the candidate. (Cross reference standard 6.1.5)

- 2.8.5 The guardianship organisation is required to ensure that all staff, volunteers and homestays (including all homestay members aged 16 and over) have been issued with a relevant DBS certificate (PVG or disclosure check in Scotland) prior to employment or hosting. A record should be kept that shows when the original certificate was seen by the guardianship organisation and the certificate number. If staff or homestays are providing a 'regulated activity'<sup>14</sup>, the guardianship organisation are required to undertake a children's barred list check in addition to the enhanced DBS check. The guardianship organisation will be required to obtain written permission from all individuals before any DBS checks can be undertaken. It is considered best practice for DBS checks to be renewed every three years. If the member of staff, volunteer or homestay (including homestay members aged 16 and over) is signed up to the DBS update service for the appropriate workforce type it would be acceptable for the guardianship organisation to accept this check. Otherwise, AEGIS asks that guardianship organisations are asked to perform their own DBS checks.
- 2.8.6 Where a DBS certificate (for a member of staff, homestay or homestay family member) lists a previous conviction, the guardianship organisation must complete a written risk assessment to determine whether the member of staff is suitable to work with children, or if the homestay would be suitable to host students. If the guardianship organisation is in any doubt as to whether or not an individual is suitable to host students, they should seek guidance from the homestay's Local Authority.
- 2.8.7 An overseas check should 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. A police check should be obtained from the country where the individual lived. The government has a document that explains the different procedures for each country<sup>15</sup>. Should the country be unable to provide a check, then the guardianship organisation should undertake additional checks to satisfy itself that the individual is suitable, such as obtaining an additional reference and conducting a risk assessment.
- 2.8.8 The guardianship organisation is required to collect information from staff, volunteers and the homestay primary carer to verify their identity, this should preferably be by the passport or if not the birth certificate. Permission should be sought from the individual for a copy of this document to be retained by the guardianship organisation for their records.

---

<sup>14</sup> For guidance on 'regulated activity' <https://www.ddc.uk.net/help-advice/what-is-regulated-activity/what-is-regulated-activity-with-children/>

<sup>15</sup> For guidance on overseas criminal record checks go to <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

2.8.9 The guardianship organisation should ensure that the member of staff or homestay has the right to work in the UK and record the date that this check took place.

**Advisory:** The guardianship organisation may wish to use a single central record to store all safer recruitment checks in one place. A sample is provided in Appendix 7.

**Advisory:** Guardianship organisations are advised to contact the homestay's Local Authority Children's Services to check whether they are aware of any concerns that may affect their suitability to act as a host for students, regardless of the length of stay. They should inform candidates that this check may be undertaken at the application stage and gain their written for such checks to be taken out.

## 2.9 Finance

2.9.1 The guardianship organisation is expected to ensure that any payments due to staff, volunteers or homestays are transacted promptly and are appropriately recorded.

2.9.2 The guardianship organisation is required to keep a record of any student finances held by the guardianship organisation (e.g. pocket money).

## 2.10 Policies

2.10.1 The guardianship organisation is required to review all policies and handbooks at least annually or more often if required. Policies and handbooks should include a publication and review date.

## 3 Pre-Arrival Support

- 3.1 The guardianship organisation is required to provide students, parents and agents (where appropriate) with information about their initial meeting and where appropriate how they will meet their homestay or be taken to their school.

## 4 Student Induction

- 4.1 The guardianship organisation is required to provide students with a suitable induction programme on or shortly after their arrival in the UK. This must include going through the contents of the student handbook and ensuring that the student has an opportunity to ask any questions about points they may be unsure of.
- 4.2 When writing handbooks and documents for students, guardianship organisations should keep the content relevant to the age of the child; for example, it might not be appropriate to include the entire safeguarding policy in the Student Handbook, but it is important that they know what is acceptable behaviour and who to turn to should they have any concerns.

## 5 Travel Arrangements

- 5.1 Where the guardianship organisation is responsible for organising any travel arrangements for students, a full record of these arrangements must be kept and shared with the student, parent, agent (where appropriate), school and homestay as appropriate. The record should include the date, times and mode of transport.
- 5.2 The guardianship organisation is required to ensure that suitable permissions are in place for any travel arrangements undertaken by students in their care.
- 5.3 The guardianship organisation is required to ensure that where they are using the services of a local, licensed taxi firm, that they have written records from the company to show that suitable checks, including an enhanced DBS/PVG Check, have been conducted on the drivers who will provide transport to their students. This is because these drivers will have direct and largely unsupervised contact with students.
- 5.4 The guardianship organisation is required to ensure that all relevant laws relating to the use of child seats or booster seats for under 12s, when the student is below 135cm in height, and seat belts for over 12s or more than 135cm tall are discussed with students and adhered to.<sup>16</sup>

**Advisory:** It is strongly recommended that students under the age of 18 travel with a permission to travel letter, an example of which can be found in Appendix 9.

---

<sup>16</sup> <https://www.gov.uk/child-car-seats-the-rules/using-a-child-car-seat-or-booster-seat>

## 6 Homestays

### 6.1 Checks

The guardianship organisation is required to undertake comprehensive checks on all members of the household before placing any students with the homestay. (See standard 2.5 Record Keeping and Standard 2.8 Safer Recruitment). These checks are to include as a minimum the safer recruitment checks outlined in standard 2.8 as well as the following:

- 6.1.1 To comply with the Safeguarding Vulnerable Groups Act 2006, an enhanced DBS check for all persons aged 16 years or over who are resident at the homestay address is required. These checks should include any people who are temporarily working or studying away from home if they will be at the homestay at the same time as any students. The same applies for any regular overnight visitors.
- 6.1.2 The guardianship organisation is required to ask all members of the homestay to complete a self-declaration. These should be individual. A suggested wording is given in Appendix 5. Best practice would be to ask for repeat self-declarations on an annual basis or include a requirement that individuals must notify you if anything contained within their self-declaration changes.

### 6.2 Information

6.2.1 The guardianship organisation is required to gather full details on all homestay members either permanently resident or temporarily living away from home. For example:

- Full Names
- Date of Birth
- Gender
- Occupation
- Interests and hobbies
- Religion (if applicable)
- Smoker / non-smoker, if so inside / outside the property
- Any dietary patterns followed by members of the homestay if they will affect the student
- The guardianship organisation is required to gather information from the homestay about any other regular visitors to the household such as extended family members and visitors and to record if they stay overnight with the homestay or not.
- The guardianship organisation is required to gather information from the homestay about any pets or animals kept by the homestay.

### 6.3 Homestay Profile

- 6.3.1 The guardianship organisation is required to provide a short profile on the homestay (based on the information above) which can be sent to students, parents and agents (where appropriate), the content of this profile is left to the

guardianship organisation to decide, but photographs are felt to be especially useful where possible. It is left to the discretion of the guardianship organisation whether contact details for the homestay are passed to parents and agents (where appropriate).

## 6.4 Availability of Homestays

- 6.4.1 The guardianship organisation is required to have access to a sufficient number of homestays to meet the needs of the students within their care, including provision for emergency situations as detailed in standard 2.6.

## 6.5 Student Accommodation

- 6.5.1 The guardianship organisation is required to ensure that the following points are adhered to when appointing homestays and to ensure a comfortable living environment for students:
- 6.5.1.1 A suitable bedroom and social area(s) are provided which are well kept, clean and in good repair, with sufficient natural light.
  - 6.5.1.2 Suitable safeguards must be in place to ensure that students have sufficient privacy from other students. Parents should be made aware of students who may wish to share bedrooms and must give consent before the arrangement goes ahead.
  - 6.5.1.3 Guardianship organisations should ensure that where homestays are using a double bed, only one student is using this facility. Under no circumstances should students share a double bed.
  - 6.5.1.4 The homestay should have suitable heating and lighting and access to sufficient supplies of hot water as required.
  - 6.5.1.5 Students should have access to a private space to study.
  - 6.5.1.6 Students should have access to appropriate hanging and drawer space for clothing.
  - 6.5.1.7 Students should have access to a bathroom with a lock on the door and either a shower or bath.
  - 6.5.1.8 Students should have the right to opt for a non-smoking and/or non-pet homestay environment.
- 6.5.2 The guardianship organisation is required to ensure that no more than three students are placed with the same homestay at any one time, unless in exceptional circumstances. Guardianship organisations should ensure that homestays who work with other guardianship organisations are not accommodating more than three students in total when members of an AEGIS guardianship organisation are being hosted. Guardianship organisations who offer alternative models of hosting that accommodate multiple students should contact the AEGIS office to discuss the provision. AEGIS has a revised set of standards for companies who operate in this way.
- 6.5.3 The guardianship organisation is required to ensure that when students under the age of 16 are in the care of a homestay, no students over the age of 20 are being hosted either by the guardianship organisation or another guardianship organisation working within the same homestay.

- 6.5.4 The guardianship organisation is required to ensure that they do not host any other paying guests or operate any form of bed and breakfast facility when hosting AEGIS students.
- 6.5.5 While there are no legal restrictions, the guardianship organisation is expected to ensure homestays adhere to NSPCC advice<sup>17</sup> on adult supervision and ensure that:
- Students aged 12 and under are not left home alone for a long period of time;
  - Students aged 16 and under are not left home alone overnight;
  - Students are not left home alone regardless of their age if they do not feel comfortable with this.

## 6.6 Meals

- 6.6.1 The guardianship organisation is required to ensure that all homestays provide students with a full board provision of breakfast, lunch and dinner during their stay, taking account of any dietary needs.
- 6.6.2 The guardianship organisation is required to ensure that all homestays provide students with access to suitable drinks and snacks during their stay.

## 6.7 Laundry

- 6.7.1 The guardianship organisation is required to ensure that all homestays provide students with suitable laundry facilities if they are resident for more than one night. In most cases the homestay would do the laundry for the student. Depending upon the age of the students, the homestay may give permission for them to do their own laundry if requested and agreed.

## 6.8 Guidelines on conduct when hosting a student

- 6.8.1 The guardianship organisation should ensure that all homestays are aware that when providing accommodation for students they should try to include them within the routines of the family as much as possible and provide a homely environment.
- 6.8.2 The guardianship organisation is required to produce suitable guidelines for homestays on the behaviour that it expects. A suggested list of content for such a code of conduct can be found in Appendix 6.
- 6.8.3 The guardianship organisation should ensure that all homestays are aware that they may only use reasonable, appropriate and lawful means of control to maintain safety.
- 6.8.4 The guardianship organisation should ensure that all homestays are aware that under no circumstances should physical punishment ever be used.
- 6.8.5 The guardianship organisation should provide guidance to ensure that all homestays are aware of how to reassure students if in distress.

---

<sup>17</sup> <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/leaving-child-home-alone/>

- 6.8.6 Use of CCTV in homestays: ICO has a Code of Practice in relation to the use of CCTVs inside and outside properties, this must be adhered to by a homestay using CCTV <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>. The key is having a clear and lawful need for the recording and to be able to demonstrate why CCTV is appropriate to meet that need, taking into account an individual's right to privacy and what the CCTV user has done to ensure the recordings are no more intrusive than they need to be and that there is a clear system to ensure any data obtained is adequately protected, in line with the usual data protection principles (just as for written data). It is essential that the ICO guidelines have been adhered to and that the main homestay carer has a paper trail to demonstrate this. Homestays using CCTV are expected to remain up to date with any changes in this Code of Practice and the guardianship organisation should conduct ad hoc checks to ensure that this is happening.

## 6.9 Annual Training

- 6.9.1 The guardianship organisation should arrange to provide the homestay with regular training opportunities, at least annually. This may be provided by newsletters / online courses / in person training during the annual visit or by any other means the guardianship organisation feels appropriate. The annual training must, as a minimum, cover an update on any safeguarding matters and changes to any national regulations affecting the care of children and young people (See standards 2.1.3 Staff, Volunteers & Homestays, and 8.3 Safeguarding Training). Please consult the AEGIS office for details of safeguarding training which AEGIS provides.

## 6.10 Health and Safety & Annual Visit

- 6.10.1 All guardianship organisations are required to demonstrate that they comply with matters of health and safety in accordance with the guidance given by the Health and Safety Executive<sup>18</sup>. Guardianship organisations with 5 or more employees will need to provide a written policy in this respect:
- 6.10.1.1 The guardianship organisation is required to conduct an initial assessment visit in person to each homestay **before** placing any students within the household. During this visit, suitable health and safety checks must be conducted and a simple risk assessment<sup>19</sup> of the property undertaken along with a check on the suitability of the accommodation. Comprehensive notes of this visit must be recorded within the Homestay File.
- 6.10.1.2 The guardianship organisation should keep an accident book for any recordable events involving students, staff, homestays or volunteers<sup>20</sup>.
- 6.10.2 The minimum health and safety checks required by AEGIS are as follows:

---

<sup>18</sup> [Prepare a health and safety policy - HSE](#)

<sup>19</sup> <https://www.hse.gov.uk/simple-health-safety/risk/risk-assessment-template-and-examples.htm>  
<https://www.rospa.com/rospaweb/docs/advice-services/home-safety/home-garden-safety-checklist.pdf>

<sup>20</sup> <http://www.hse.gov.uk/pubns/books/accident-book.htm>

- 6.10.2.1 A minimum of one smoke alarm to be installed on every storey.<sup>21</sup>
- 6.10.2.2 A carbon monoxide alarm to be installed in any room containing a gas, liquid or solid fuel burning appliance.
- 6.10.2.3 An annual landlord gas safety check to be undertaken by a Gas Safe registered engineer and a copy of the certificate provided to the guardianship organisation.<sup>22</sup>
- 6.10.2.4 The homestay must ensure that the electrical system is safe, e.g. sockets and light fittings are secure and not overloaded and any appliances used by the student are safe.
- 6.10.2.5 The homestay must discuss the possible evacuation routes from the property with students. If doors or windows are locked students must know where to find the key in the event of a fire.
- 6.10.2.6 It is not an AEGIS requirement for homestays to have fire extinguishers or fire blankets unless the property is classed as a house in multiple occupation<sup>23</sup>. If fire extinguishers and fire blankets are provided they must be suitably serviced.
- 6.10.2.7 Where open fires are used, a suitable fire guard should be in place when the fire is lit.
- 6.10.2.8 Any matches / lighters should be appropriately stored.
- 6.10.2.9 A basic first aid kit should be available to include, plasters, sterile eye-pad, triangular bandage, safety pins, non-medicated wound dressing, disposable gloves, leaflet giving guidance on first aid.<sup>24</sup>
- 6.10.2.10 Any prescription medication and drugs should be kept safely especially when hosting young students.
- 6.10.2.11 Alcohol should be appropriately stored.
- 6.10.2.12 The homestay should have an awareness of basic food hygiene when preparing meals for students.<sup>25</sup>
- 6.10.3 The guardianship organisation is required to conduct at least an annual visit in person to each homestay held on their records. During this visit, support should be offered to the homestay and suitable checks for safety and suitability should be undertaken to ensure any changes since the last visit are properly recorded and felt to be acceptable. Comprehensive notes of this visit must be recorded within the Homestay File.

**Advisory:** Guardianship organisations and homestays may wish to ask students to use UK plugs only and not to use overseas adaptors as these can be a source of fire. UK mobile phone and laptop adaptors are relatively easy and inexpensive to obtain in most cases.

## 6.11 Visits and Inspections

- 6.11.1 As part of the application process, the guardianship organisation is required to inform their homestays that they are expected to co-operate when there is an inspection by

---

<sup>21</sup> <https://www.gov.uk/government/publications/smoke-and-carbon-monoxide-alarms-explanatory-booklet-for-landlords/the-smoke-and-carbon-monoxide-alarm-england-regulations-2015-qa-booklet-for-the-private-rented-sector-landlords-and-tenants>

<sup>22</sup> <http://www.hse.gov.uk/gas/landlords/safetycheckswho.htm>

<sup>23</sup> <https://www.gov.uk/private-renting/houses-in-multiple-occupation>

<sup>24</sup> <http://www.hse.gov.uk/firstaid/faqs.htm#first-aid-box>

<sup>25</sup> <https://www.food.gov.uk/business-industry/food-hygiene/training#toc-3>

AEGIS or any other statutory body. A meeting with the homestay and access to their accommodation at a pre-arranged time may be necessary.

**Advisory:** The guardianship organisation should make contact with the homestay during the student's stay to check that both parties are happy with how the stay is going.

## 6.12 Using a Third-Party Homestay Provider

- 6.12.1 Whilst AEGIS expects its members to usually source their own homestays, there may be occasions where members have a need to source homestays using a third-party provider. For example, they may have a request for a homestay in an area of the country where they do not usually operate. Members must contact AEGIS for further information when using homestays sourced from a third party as it is still a requirement for checks to be undertaken on homestays and their accommodation. This is regardless of whether the third party has already undertaken their own checks.

## 7 Student Folder

- 7.1 The guardianship organisation is required to produce a folder for each student. This folder should be reviewed regularly and at least annually.
- 7.2 Relevant permission must be obtained from the parent(s) to hold this information and to pass it on to homestays / schools as appropriate.
- 7.3 The guardianship organisation must have regard for the fact that the information contained within the student folder is highly sensitive and should only share relevant details once the appropriate permissions are in place and in line with the ICO data protection principles.
- 7.4 The guardianship organisation must ensure that all confidential data is securely stored and that confidentiality is maintained when sharing any relevant parts of the Student Folder with other parties.
- 7.5 The contents of the folder should include as a minimum:
  - 7.5.1 Student's full name and date of birth, and any other name that they are known by (preferred name)
  - 7.5.2 Student's home address
  - 7.5.3 Details of parent(s) or legal guardian(s) to include full name(s), address(es), contact telephone number(s), e-mail(s), occupation(s)
  - 7.5.4 Details of any UK family contact(s) to include their relationship to the student, full name(s), address(es), contact telephone number(s), e-mail(s), occupation(s)
  - 7.5.5 Details of any agent(s) involved with the family to include their full name(s), address(es), contact telephone number(s), e-mail(s) and any ongoing services they provide to the student
  - 7.5.6 Details concerning any relevant information about the student's family background
  - 7.5.7 Details concerning permissions and consents given or withheld by the parents
  - 7.5.8 Details concerning the student's health including any medical details, immunisation details, allergies, dietary requirements, health concerns
  - 7.5.9 Where appropriate, details of any private medical cover for the student
  - 7.5.10 Information about the student's interests and hobbies
  - 7.5.11 Information about any specific learning difficulties the student may have
  - 7.5.12 Details about the student's school and relevant contact details to include the name of the school, the student's house / year group, the name, e-mail and telephone number for any relevant members of staff (e.g, tutor / house staff), any other relevant information
  - 7.5.13 Evidence to support regular student visits.

**Advisory:** The guardianship organisation may feel it is necessary to keep a copy of the student's passport ID page where appropriate a copy of the student's Biometric Resident Permit (BRP) and police registration document.

## 8 Safeguarding, Child Protection and Welfare

### 8.1 Safeguarding & Child Protection Policy

- 8.1.1 The guardianship organisation is required to produce a suitable safeguarding & child protection policy which should relate to all relevant points contained in the latest version(s) of government guidance: *Keeping Children Safe in Education*<sup>26</sup> and *Working Together to Safeguard Children*<sup>27</sup> along with any other appropriate legislation. (See Appendix 4 for a guide to the minimum content for a Safeguarding Policy). A copy must be provided to all members of staff, homestays, volunteers and made available to parents and partner schools on request. It should ideally be available on the guardianship organisation's website if one exists.
- 8.1.2 The safeguarding & child protection policy must be reviewed regularly, at least annually and dated.
- 8.1.3 In the case of students, the guardianship organisation must ensure that they know how to keep safe, how to report any concerns they may have and be aware that any concerns they raise will be treated seriously. This can be done in an age-appropriate way in the Student Handbook or in a separate publication.

### 8.2 Designated Safeguarding Lead (DSL)

- 8.2.1 The guardianship organisation must appoint a senior member of staff to act as the organisation's DSL.
- 8.2.2 This individual must attend suitable training as approved or provided by the Local Safeguarding Partnership (LSP) – (formerly Local Safeguarding Children Board (LSCB)), AEGIS or the NSPCC. Online DSL courses are not acceptable. This training must be renewed every two years.
- 8.2.3 The DSL should attempt to liaise with the LSP to make them aware of the activities undertaken by the guardianship organisation via email, letter or telephone.
- 8.2.4 The DSL should make contact and liaise as necessary with their counterparts in each of the partner schools the guardianship organisation works with.
- 8.2.5 Where there is a safeguarding concern, the DSL must liaise with the LSP as necessary and ensure all local inter-agency procedures are followed and documented.
- 8.2.6 Any safeguarding case notes should be kept securely and only accessible to the DSL and senior management. These should include any correspondence with the Local Children's Services or other professional organisations e.g. Police. The guardianship organisation must have a suitable plan in place when the DSL is

---

<sup>26</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1014057/KCSIE\\_2021\\_September.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014057/KCSIE_2021_September.pdf)

<sup>27</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729914/Working\\_Together\\_to\\_Safeguard\\_Children-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf)

unavailable. Ideally there should be a deputy DSL who is trained to the same level as the DSL.

## 8.3 Safeguarding Training

- 8.3.1 It is the responsibility of the DSL to ensure that all members of staff, volunteers and homestays receive appropriate introduction to safeguarding training (previously referred to as level 1). This can be done online or in person and should be completed before starting their role. Training then needs to be renewed every three years. If the individual has already completed suitable safeguarding training, guardianship organisations should see a copy of the certificate and record the date and level of training. This certificate should also include the date of the training and/or the expiry date. Guardianship organisations are advised to liaise with AEGIS or their LSP (formerly LSCB) for training recommendations.
- 8.3.2 The guardianship organisation is required to keep a formal record of all safeguarding training
- 8.3.3 All staff and homestays should receive regular safeguarding updates, at least once per year (See standards 2.1.3 Staff, Volunteers & Homestays, and 6.10 Checks).

## 8.4 Whistleblowing

- 8.4.1 The guardianship organisation is required to produce a suitable policy to cover the aspects of whistleblowing within their organisation, which should be shared with staff and homestays.
- 8.4.2 Whistleblowing procedures protect staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties. The policy must show how this is managed by the guardianship organisation.<sup>28</sup>
- 8.4.3 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](mailto: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.pcaw.co.uk](http://www.pcaw.co.uk). Details of these services should be included within the organisation's whistleblowing policy.

## 8.5 Allegations and Low-Level Concerns

- 8.5.1 The guardianship organisation is required to outline procedures that they will follow in the event that an allegation is made against a member of staff, homestay or volunteer. This can be included within the safeguarding policy.

---

<sup>28</sup> <https://www.gov.uk/whistleblowing/what-is-a-whistleblower>  
<https://www.gov.uk/guidance/whistleblowing-procedure-for-maintained-schools>

- 8.5.2 The guardianship organisation is required to have a policy that outlines their procedure for dealing with low-level concerns. A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out in the Safeguarding and Child Protection Policy. This can be a standalone policy or included within the safeguarding policy. The guardianship organisation should ensure that staff understand the importance of reporting any low-level concerns that they may have.

## 8.6 Anti-Radicalisation – Prevent Duty

- 8.6.1 The guardianship organisation is required to produce a suitable policy to cover the aspects of anti-radicalisation which must relate to all relevant points contained in the latest version of the government guidance: *The Prevent Duty: for schools and childcare providers*.<sup>29</sup> and *Prevent Duty Guidance*.<sup>30</sup>
- 8.6.2 The anti-radicalisation policy must be reviewed regularly and at least annually and then updated as necessary. The policy should be made available to members of staff, volunteers, homestays and parents and partner schools on request.
- 8.6.3 In the case of students, the guardianship organisation must cover the key points in appropriate language in the Student Handbook. This should include the 24 hour contact number.
- 8.6.4 The policy must include a 24 hour contact number for students, staff, volunteers, homestays and schools to report any radicalisation concerns. These would normally be reported to the DSL or another senior trained member of staff.
- 8.6.5 At least one member of staff must complete Prevent/Anti-radicalisation training. The following free online courses may be helpful for the DSL (and deputy) or nominated staff member who takes the lead on Prevent for the organisation. These are provided by the government but courses are available from other providers:

**Prevent awareness e-learning:**

<https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>

**Prevent referrals e-learning:**

[https://www.elearning.prevent.homeoffice.gov.uk/prevent\\_referrals/01-welcome.html](https://www.elearning.prevent.homeoffice.gov.uk/prevent_referrals/01-welcome.html)

**Channel awareness e-learning:**

[https://www.elearning.prevent.homeoffice.gov.uk/channel\\_awareness/01-welcome.html](https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html)

**Advisory:** All other staff, volunteers and homestays are also encouraged to complete the government basic level Prevent awareness e-learning. (Please see the link above.)

## 8.7 Missing Students

- 8.7.1 The guardianship organisation is required to produce a suitable policy to cover the steps to be followed by members of staff and homestays in the event that a

---

<sup>29</sup> <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

<sup>30</sup> <https://www.gov.uk/government/publications/prevent-duty-guidance>

student goes missing. The guardianship organisation may find it useful to refer to the guidance issued to children’s homes when compiling this policy.<sup>31</sup>

- 8.7.2 A copy of the policy must be shared with all members of staff, volunteers, homestays and made available to parents and partner schools on request
- 8.7.3 The policy must include a 24-hour contact number to report any missing students to the guardianship organisation.
- 8.7.4 The guardianship organisation should also take into account of the guidance in *Children Missing from Education*<sup>32</sup> where this is relevant.

## 8.8 Student Behaviour

- 8.8.1 The guardianship organisation is required to produce suitable guidelines (for example in a policy or handbook) to cover the positive behaviour it expects from students and to provide guidance in key areas of their expectations. These should be tailored to the age of the students. The guidance should be written for the benefit of students, parents, agents (where appropriate) and homestays and refer to the expectations in the following key areas (where appropriate for the age of child):
  - 8.8.1.1 Behaviour and conduct when staying with a homestay
  - 8.8.1.2 Curfew arrangements
  - 8.8.1.3 Use of the kitchen area
  - 8.8.1.4 Use of the bathroom
  - 8.8.1.5 Use of the Wi-Fi / access to the home computer
  - 8.8.1.6 Laws regarding the consumption of alcohol
  - 8.8.1.7 Laws regarding the use of drugs and illegal substances
  - 8.8.1.8 Laws regarding smoking
  - 8.8.1.9 Laws regarding sexual activity
  - 8.8.1.10 Laws regarding tattoos and body piercings
  - 8.8.1.11 Arrangements when students wish to stay away from the homestay

## 8.9 Anti-Bullying including Cyberbullying

- 8.9.1 The guardianship organisation is required to produce an Anti-Bullying, including Cyberbullying Policy. This should be shared with staff and homestays and made available to parents and students on request.
- 8.9.2 The guardianship organisation is required to produce suitable guidelines for students to help them understand how to deal with any bullying issues they or their friends may be facing, these should also be made available to homestays. This could be included in the Student Handbook or produced as a standalone document.<sup>33</sup>

---

<sup>31</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/307867/Statutory\\_Guidance\\_-\\_Missing\\_from\\_care\\_3\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care_3_.pdf)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/271820/Flowchart\\_when\\_a\\_child\\_goes\\_missing\\_from\\_care.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/271820/Flowchart_when_a_child_goes_missing_from_care.pdf)

<sup>32</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550416/Children\\_Missing\\_Education\\_-\\_statutory\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)

<sup>33</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/444862/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444862/Preventing_and_tackling_bullying_advice.pdf)

## 8.10 Online Safety

- 8.10.1 The guardianship organisation is required to produce an Online Safety Policy which must be provided to staff and homestays and to students and parents on request.

---

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/444864/Supporting\\_bullied\\_children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444864/Supporting_bullied_children.pdf)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/374850/Cyberbullying\\_Advice\\_for\\_Headteachers\\_and\\_School\\_Staff\\_121114.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/444865/Advice\\_for\\_parents\\_on\\_cyberbullying.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444865/Advice_for_parents_on_cyberbullying.pdf)

<https://safeguardingtool.nspcc.org.uk/resource-library/resources/preventing-responding-bullying-/>

Copyright ©2021 AEGIS, The Association for the Education and Guardianship of International Students. All Rights Reserved.

## 9 Complaints

- 9.1 The guardianship organisation is required to produce and follow a suitable policy on recording and responding to complaints in a timely manner.
- 9.2 The policy should cover an informal and a formal resolution stage, and then a further stage for referring the matter to AEGIS if the complaint cannot be resolved by the guardianship organisation.
- 9.3 The guardianship organisation should keep a written record of all formal complaints and the action that was taken as a result of those complaints (regardless of whether they are upheld).

## 10 Day Students, Prolonged Stays with Hosts and Private Fostering

- 10.1 Where a guardianship organisation has any students under the age of 16 (under 18, if the student has a disability) living with homestays who are not their parent or a close relative for 28 days or more, they must adhere to the regulations regarding private fostering in place within their local area as directed by their local authority.<sup>34</sup>
- 10.2 The guardianship organisation is required to demonstrate how they liaise with the school and the homestay to ensure that where possible the local authority is notified of the proposal for a private fostering arrangement at least six weeks before the date on which the arrangement is to begin. Where the arrangement is to begin within six weeks, the local authority is to be informed immediately.
- 10.3 The guardianship organisation must demonstrate how they liaise with the school and homestay to explain carefully what is required of them in entering into a private fostering arrangement. This includes explaining that there will be regular visits and meetings with the local authority.
- 10.4 The guardianship organisation is required to demonstrate that they have a system in place for recording all correspondence with the local authority private fostering team and securing relevant permissions to share such information as is necessary with the student, parents, agents (where appropriate), homestay and partner school.
- 10.5 In the case of day students over the age of 16, the guardianship organisation should be mindful of the extended period students will spend with homestays and regularly carry out suitable checks to monitor and ensure their welfare.

---

<sup>34</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/274414/Children\\_Act\\_198\\_9\\_private\\_fostering.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/274414/Children_Act_198_9_private_fostering.pdf)  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/274482/national\\_minimum\\_standards\\_for\\_private\\_fostering.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/274482/national_minimum_standards_for_private_fostering.pdf)

## 11 Liaison with Partner Schools

- 11.1 The guardianship organisation is required to keep in regular contact with the student's school, in line with the requirements of the parents. The guardianship organisation should establish the most suitable person to liaise with at the school and then ask that they disseminate information to others within the school as appropriate.
- 11.2 The guardianship organisation is required to inform their liaison contact at the school whenever they are visiting the site.
- 11.3 The guardianship organisation is required to provide schools with a statement of service, showing which students they are responsible for and what services each student's parents have requested they provide. This statement must be sent at the start of each academic year or when a new student joins the school.
- 11.4 The guardianship organisation is required to liaise with the school where appropriate concerning all travel and transport arrangements.
- 11.5 The guardianship organisation is required to liaise with the school where appropriate regarding any homestay arrangements.
- 11.6 The guardianship organisation is required to keep a comprehensive record or log of all visits to schools.

# Appendix A

## Preliminary Accreditation Essential Documents and Evidence for submission

- Statement of aims, principles and practice – see Standard 1.1
- Safeguarding and Child Protection Policy – see Standard 8.1 and Appendix 4 for further details
- Evidence of safeguarding training of DSL, staff and homestays – see standards 8.2 and 8.3
- \*Safer Recruitment Policy – see Standard 2.8 for further details
- Evidence of safer recruitment training – see Standard 2.8.2 and Appendix
- \*Whistleblowing Policy – see Standard 8.4
- \*Low Level Concerns Policy – Standard 8.5
- \* Data Protection Policy and Privacy Notice – see Standard 2.7
- \*Missing Student Policy – see Standard 8.7
- \*Anti-Bullying including Cyberbullying – see Standard 8.9
- \*Online Safety Policy – See Standard 8.10
- Student Behaviour Code of Conduct – see Standard 8.8
- \*Anti- Radicalisation - Prevent Duty Policy – see Standard 8.6
- Evidence of Prevent Training of DSL and/or or nominated Prevent lead – see Standard 8.6
- Complaints Policy – see Standard 9
- Welfare Health and Safety Policy, where relevant– See Standard 6.10
- Emergency Procedure – see Standard 2.6
- Staff Code of Conduct – see Standard 2.1, Standard 6.8 and Appendix 6
- Evidence regarding processes relating to Private Fostering, where appropriate – see Standard 10
- Company Organisation Diagram (organogram)- if applicable – see Standard 2.1.1
- An example of a staff contract – See Standard 2.2
- An example of a parent / agent (if applicable) contract – see Standard 2.2
- An example of a homestay contract – see Standard 2.2
- Checklists used to record suitability of homestays and their accommodation – see Standard 6.10
- Copies of any brochures, if available – see Standard 1.2
- Student Handbook – see Appendix 1

- Parent Handbook – see Appendix 2
- Homestay Handbook – see Appendix 3
- Example of a School Statement of Service – see Standard 11.3
- Insurance Documents – see Standard 2.4
- ICO certificate- see Standard 2.7
- Job descriptions for staff and homestays – see Standard 2.1
- Evidence of DBS, PVG or disclosure checks for all staff, volunteers and homestays and Children’s Barred List checks where appropriate - see Standard 2.8
- Evidence of safer recruitment checks for all new staff, volunteers and homestays – see Standard 2.8
- DBS certificates for any directors/ owners – see Inspection and Accreditation – Preliminary Accreditation

*Items marked \* may be included in the Safeguarding and Child Protection Policy rather than as separate documents if required.*

*Please ensure that all documents containing personal detail (for example, contracts and Single Central Records) are redacted/anonymised. We also strongly suggest that files are password protected before they are submitted to AEGIS for inspection.*

# Appendix 1

## Content for a Student Handbook

This should include useful information to students with advice on the following areas in a language and style appropriate to their age.

### Minimum Required Content

- Welcome and introduction from the guardianship organisation
- The role of the guardianship organisation, your guardian and the role of the homestay
- The responsibilities as a student, referring to/including the Student Code of Conduct
- Contact details of who in the guardianship organisation to turn to in case of an emergency and if the student has any concerns.
- The process for arriving in the UK – details on airport arrivals, remembering your passport, Biometric Residence Permit (BRP) etc., how to find the transport when you arrive
- A little background to living in the UK, British customs and etiquette etc.
- Personal safety and the care of valuable possessions and cash / credit cards
- Information on living with a homestay
- Information on meal times, what is provided, table manners, etc.
- Laundry arrangements
- Homesickness – signs and symptoms and how to cope with it / where to get help
- Electrical appliances and safety – specifically overseas phone chargers and laptop power devices posing a significant fire risk, so if possible, purchase UK versions
- What to do in a medical emergency
- Permission for visiting the local area / shops / travelling further afield / excursions
- Curfew / bed times
- English laws, including smoking, drinking, sexual activity, illegal substances
- Cover any relevant sections of the Safeguarding Policy which helps inform student about how to keep safe
- Prevent / anti-radicalisation
- Safe use of the internet, access to Wi-Fi
- Bullying / cyberbullying – how to be aware and who to turn to for help or guidance.

- List of useful contacts – telephone numbers and websites e.g. ChildLine, LSP (formerly LSCB) number, The Children’s Commissioner.<sup>35</sup>

#### **Additional items to consider**

- Mobile phone registration / SIM cards
- Safe and courteous use of your mobile phone / homestay telephone
- Registering with a doctor / private medical insurance / dentist
- Using private cars / taxis – including use of seat belts
- Using public transport – including permission and booking tickets etc.
- Traffic safety as a pedestrian / cyclist
- Pocket money
- Setting up a bank account
- Keeping your passport, BRP safe and police registration
- Religion in the UK and access to places of worship
- Learning to drive
- Having regard for school rules when living with a homestay as well
- Advice on keeping safe during a Pandemic.

---

<sup>35</sup> <https://www.childrenscommissioner.gov.uk/about-us/contact/>

## Appendix 2

# Content for a Parent Handbook

### Minimum Required Content

- Welcome and introduction from the guardianship organisation
- Explanation of the role of the guardian, homestay, school
- Guardianship organisation's commitment to safeguarding and child protection
- Reference of where to find the guardianship policies on safeguarding, prevent / anti-radicalisation, complaints, anti-bullying, missing student, e-safety, data protection
- A clear statement of the services to be provided in line with the parent contract
- Contact details for the guardianship organisation and clear guidelines about who to contact if there is an emergency, problem or concern. A 24/7 emergency contact should be included.
- Transport arrangements: who will meet the student at the airport? Use of drivers / taxis / trains. Who is responsible for organising transport at different times, e.g. start / end of terms, half-terms, exeats etc? What information is needed from parents and to whom should it be sent and by what deadlines?
- Instructions on the procedure for requesting and arranging or changing exeat, half-term, holiday or other periods of homestay
- Arrangements for homestay provision in an emergency e.g. medical issue / suspension
- Information on the type of accommodation offered and facilities available for the student
- Arrangements for the provision of pastoral and academic updates on the student's welfare and progress at school and with the Homestay in line with service provided where appropriate
- Arrangement for expenses
- Advice on life in the UK
- What parents can expect from the homestay
- Arrangement and advice on student finances, e.g. pocket money / bank accounts / credit cards
- Limitation of liability arising from conduct by any student placed with a homestay by the guardianship organisation, subject to legal limitations - Confirmation as to the level of any liability (and in particular a limit on any liability) arising from the conduct and/or behaviour of any student placed with the homestay by the guardianship organisation. This will need to reflect the legal limitations regarding the limiting of such liabilities. This provision

essentially requires a statement confirming that the homestay provider (and guardianship organisation) will not be liable for any conduct of the student

- Information on the guardianship organisation's responsibilities during a contagious pandemic.

# Appendix 3

## Content for a Homestay Handbook

### Minimum Required Content

- Welcome and introduction from the guardianship organisation
- The role of the guardianship organisation and the role of the homestay
- Looking after and respecting the rights of the student, including reference to different age groups, cultures, religions etc.
- Exercising the same levels of care as a responsible parent – *in loco parentis* – accepting the day-to-day responsibility for the care of the student
- Reference of where to find the guardianship policies on safeguarding, prevent / anti-radicalisation, complaints, anti-bullying, missing student, online safety, data protection.
- The requirement to undertake suitable safeguarding training and an annual update provided by the guardianship organisation – see Standard 8.3
- Using only lawful and reasonable / appropriate means of control / contact / restraint to maintain safety and good order in the homestay. A statement saying physical punishment is illegal and must never be used must be included – see Standard 6.8 & 8.8 and Appendix 6
- Guidance on providing comfort to students in distress – see Appendix 6
- The requirement for homestays to consider when it would be acceptable to leave a student unattended within the household<sup>36</sup>
- The standard expected for the accommodation, including the requirement for a separate private room, facilities within the room, including a space to study, access to a bathroom – see Standard 6.5
- The requirements for providing meals and snacks / access to the kitchen – see Standard 6.6
- Laundry arrangements – see Standard 6.7
- Access to communal areas within the house – see Standard 6.5
- Access to computers / Wi-Fi – see Standards 8.8
- Safe use of computer and Internet – see Standards 8.10
- Health and safety in the home, including current household insurance, gas safe certificate, carbon monoxide alarms, smoke alarms, fire awareness – see Standard 6.10

---

<sup>36</sup> <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/leaving-child-home-alone/>

- The use of a car by the homestay for transportation purposes, including insurance requirements – see Standards 2.4 and 5
- Clear instructions on whom to contact in the event of a problem or emergency – see Standard 2.6
- Guidance on the number of students to be accepted – see Standard 6.5
- Guidance on the sharing of rooms and facilities provided – see Standard 6.5
- A clear statement of expenses to be claimed and payments – see Standard 2.9
- Explanation / description of student behaviour / code of conduct – see Standard 8.8
- Permission for visiting the local area / shops / travelling further afield / excursions – see Standard 8.8
- Curfew / bed times – see Standard 8.8
- Circumstances / arrangements surrounding the student staying away from the homestay during their time with the family – see Standard 8.8
- Advice for helping students to deal with homesickness
- Reference to the formal contract, including conditions for terminating the contract – see Standard 2.2
- The requirement to inform the guardianship organisation about any changes to the Homestay arrangements
- The requirement not to have any other paying guests / run a bed and breakfast arrangement when looking after students from the guardianship organisation – see Standard 6.5
- List of useful contact details including 24/7 emergency contact at the organisation – see Standard 2.6
- Being aware of the private fostering requirements where appropriate – see Standard 10
- Arrangements for allowing a member of the guardianship organisation or in some cases the student's school to inspect the accommodation at least once a year – see Standard 6.11
- Information on the guardianship organisation's responsibilities during a contagious pandemic.

## Appendix 4

# Minimum content for a Safeguarding Policy

### See Standard 8.1

A safeguarding or child protection policy is a statement that makes it clear what an organisation or group will do to keep children safe.

You are advised to contact your Local Safeguarding Partners where your offices are based, who may well have a model policy for you to look at as a starting point. Standard 8.1.1 also includes the requirement that the policy must relate to all relevant points contained in the latest version(s) of government guidance: *Keeping Children Safe in Education*<sup>37</sup> and *Working Together to Safeguard Children*<sup>38</sup> along with any other appropriate legislation.

### As a minimum your policy must include:

- A statement setting out the organisation's commitment to protecting all children
- A statement that explains how safeguarding starts at the top and that the directors/ owners of the guardianship organisation will have the appropriate safeguarding knowledge and involvement in the procedures that are in place. This includes having oversight of arrangements.
- A statement to explain how where there is a safeguarding concern, the guardianship organisation will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- What the organisation will do to keep children safe and respond to concerns
- A list of the supporting procedures that accompany the policy
- Details on how the guardianship organisation advises staff, homestays and volunteers to read *Keeping Children Safe in Education* Part 1 (for staff, volunteers and homestays that work with children) or Annex A (for those members of staff who do not work directly with children). [A link to these documents should be inserted or signposted].
- A list of defined terms: e.g. safeguarding, child protection etc.
- An up-to-date list of the types and definitions of abuse and neglect along with common signs and symptoms to be aware of in line with those found in the latest version of *Keeping Children Safe in Education*

---

<sup>37</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1014057/KCSIE\\_2021\\_September.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014057/KCSIE_2021_September.pdf)

<sup>38</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779401/Working\\_Together\\_to\\_Safeguard-Children.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf)

- Actions to be followed if there are concerns about a child or young person
- How the guardianship organisation will respond to allegations of peer-on-peer abuse (including sexual violence and sexual harassment.
- Procedures for allegations of abuse against a member of staff or homestay (for those that meet the harm threshold and those that do not)
- Explanation of the systems in place for children to report abuse and how their concerns will be treated seriously
- How to receive a disclosure from a child or young person
- The role of the DSL including full contact details
- A list of how safeguarding records will be kept
- A statement on when and how information sharing will take place (with who and when this might be required), reminding staff, homestays and volunteers that any safeguarding information shared with them must be kept confidential.
- Training on offer to all staff, volunteers and homestays
- A statement on whistleblowing
- A statement on liaison with your LSP (formerly LSCB), including the contact details for all LSPs (formerly LSCBs) within the areas that your company operates
- The contact details of the Local Authority Designated Officer (LADO)
- A statement regarding liaison with parents, agents (where appropriate) and partner schools
- Signpost the reader to the Emergency Procedure.
- Signpost the reader to the Low-Level Concerns policy (if separate to safeguarding policy)

### **Points to Consider**

- What are the potential risks to children - who may pose a risk? What situations may increase risk?
- How do you check people who work or volunteer for the organisation currently and new starters?
- What are the different ways someone might raise a concern?
- How should you respond to concerns or allegations of harm?
- How does this policy link up with other policies and procedures?
- What training will you provide for staff and volunteers?
- How will you raise awareness for everyone involved with the organisation?

### **Practical tips**

- Tailor your policy and procedures to suit the needs of your organisation.

- Use words and phrases that will mean the most to the group or community.
- Involve people from different parts of the organisation to make sure the policy is relevant for everyone.
- Think about how you can involve children and incorporate their perspective.
- Ask different people in different roles to read the policy and feedback to ensure it is accessible to everybody.

## Appendix 5

# Suggested wording for the Homestay Self-Declaration

See Standard 6.1

Have you or any full-time resident in the household ever: (Please tick YES / NO)

- Been convicted of any offence against a child?
- Been entered on the child protection register or been the subject of a child protection plan?
- Had a child removed from your/their care by order of a court?
- Been denied access to or made subject of an injunction regarding you/their own or other children?
- Been disqualified from activity as a foster parent?
- Been refused registration under the Children Act 1989 e.g. as a child minder?
- Been on the list of individuals barred from working with children or otherwise disqualified to work with children, administered by the DBS/Disclosure Scotland or subject to sanctions imposed by any regularity body?
- Been convicted of a criminal offence or have a court case pending?
- Had family court, civil court or criminal justice system incidents / appearances?
- Been subject to a 'sex offender order', civil finding or injunctions (relevant to any family court matter, domestic situation child or children)?
- Been subject to an emergency protection order?

You may then consider including the following statements:

This position is exempt from the Rehabilitation of Offenders Act 1974 and therefore all convictions, cautions, written warnings, bind overs, including those regarded as 'spent' must be declared. If you have answered 'YES' to any of the questions above, please supply further details along with the relevant dates on a separate form marked Private and Confidential for the attention of the xxxxxx

Section 70a of the Children Act 1989 states that a person who gives information which he/she knows to be false/misleading or makes a statement in this notice will be guilty of an offence and liable on summary conviction to a fine.

*Please note: having a criminal record may not necessarily stop you from working with our company; this will depend upon the nature of the offence.*

By law, all families hosting a student under the age of 16 years for more than 28 consecutive days will be classed as private fosterers. This procedure would involve further checks by a social worker.

## Appendix 6

# Suggested content for a Staff and Homestay Code of Conduct

### See Standard 8.9

*Keeping Children Safe in Education* requires schools to produce a code of conduct for all staff. As guardianship organisations work with students in a similar way to schools, AEGIS requires members to produce their own code of conduct for all staff and homestays.

The areas guardianship organisations may wish to consider in developing a code of conduct that is appropriate to their particular business are as follows:

- Power and positions of trust
- Duty of care to children and young people
- Exercising professional judgement
- Use of appropriate language
- Sexual contact with young people
- Communication with students
- Social contact with students
- Social contact with parents / agents / staff at partner schools
- Physical contact including restraint
- An outright ban on any physical punishment
- Care of distressed students
- One-to-one meetings
- Students' entitlement to privacy
- Transporting students
- Gifts and rewards
- Use of photographs and videos
- Searching students and their belongings
- Reference to Low Level Concerns

- Reference to Whistleblowing
- Reference to allegations against adults/staff

# Appendix 7

## Sample Single Central Record for Safer Recruitment Checks

### RECORD OF SAFER RECRUITMENT CHECKS FOR STAFF, HOMESTAYS AND VOLUNTEERS

All checks must be completed **before** employment commences / children are placed with families

Position & Date of Commencement with GO	Identity Checks					DBS		Children's Barred List		Right to work in the UK	
	Name	Dob	Address	ID Check Documents. Preferably the passport / birth certificate if no passport. Copies should be kept on file	ID Check Documents Seen Date and initials of person who received them.	Disclosure Number & Level (PVG in Scotland)	Original Certificate viewed by and date	Date Children's Barred List check undertaken	Name of person making checks and date	What evidence of right to work in UK was provided	Name of person making checks and date

Overseas Check (Further checks for those living or working outside of the UK)	Professional Qualifications	References				Medical Declaration	Induction Training	Notes
Date of check and initials of checker (N/A to be used if not applicable)	Date original documents seen and initials of checker (N/A to be used if not applicable)	Date received/date verified and initials of checker	Date received/date verified and initials of checker	Date Received	Date Completed			

# Appendix 8

## AEGIS Grievance Procedure

The following parties may have a grievance against a school or guardianship organisation

- Overseas parent(s) (on behalf of the student)
- UK homestay
- School
- Guardianship organisation
- Overseas agent or other organisation, which may have placed a student with a guardianship organisation

### Stage 1 - Informal

In the first instance, all grievances should be made informally, to the school or guardianship organisation. A record should be kept, in chronological order, of all correspondence, subsequent responses and action taken.

It is to be hoped that the matter will be resolved satisfactorily between the parties involved at this stage. If appropriate, it can be helpful to call informally upon the services of an impartial arbitrator who has some experience and prior knowledge of the circumstances, which led to the declaration of a grievance.

### Stage 2 - Formal

If the matter cannot be resolved informally, then grievances should be directed in writing, to the school or guardianship organisation. As for Stage 1, a record should be kept, in chronological order, of all correspondence, subsequent responses and action taken.

### Stage 3 - Panel

If the grievance cannot be resolved successfully at stage 2, both parties may make formal representations, in writing, to the trustees of AEGIS c/o:

Yasemin Wigglesworth - Executive Officer  
AEGIS  
The Wheelhouse  
Bond's Mill Estate  
Bristol Road  
Stonehouse  
Gloucestershire  
GL10 3RF

E-mail: [info@aegisuk.net](mailto:info@aegisuk.net)

Telephone: +44 (0) 1453 821293

A complaints panel comprising three people, one of whom will act as chair, will be appointed by the trustees to hear the grievance. The panel will be made up of independent and impartial arbiters.

In cases where it is deemed necessary, an interpreter may be in attendance. The decision of the panel will be final. AEGIS will keep a written record of the complaint and action taken, regardless of whether the complaint was upheld or not. A written report of the findings, along with any recommendations will be made available to the complainant and, where appropriate, the person who has been complained about.

#### **Stage 4**

Should the decision of the complaints panel at stage 3 fail to settle the grievance, the complainant has the right to pursue the grievance through the courts.

## Appendix 9

### Example Permission to Travel Letter

Dear Sirs

Re: *[Name; DOB; Nationality; Passport Number of student]*

School: *[Name and address of school attending]*

We can confirm that we are the biological parent(s) of *[insert name of student]*

We can confirm that our son/daughter will commence studies on the *[insert date]* at *[insert name of school]*, an independent boarding school in the UK. As a boarding student, my son/daughter will be resident at the above school during her time in the UK. We can confirm that we give our consent to any national or international travel which our child needs to undertake between school and travelling home and the living arrangements provided by the school.

We can confirm that we will be financially responsible for our child's academic and boarding fees throughout their stay in the UK. The funds are available in full for our child.

We would very much appreciate your assistance in granting our son/daughter leave to enter so that they may commence their studies in the UK.

*[Signed by parent]*