

AEGIS Safeguarding and Child Protection Policy



AEGIS

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Policy Statement

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

The purpose of this policy is to provide staff, trustees and contracted inspectors with the framework they need in order to keep children safe and secure when a concern is identified. The policy also informs guardianship organisations, parents, agents and schools how we will deal with a safeguarding concern.

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

For the purposes of this policy, references to ‘staff’ include AEGIS staff, trustees and contracted inspectors.

Key Safeguarding Contact Details

Role	Name	Telephone Number	Email
Designated Safeguarding Lead (DSL)	Yasemin Wigglesworth	01453 821293	yasemin@aegisuk.net
Deputy Designated Safeguarding Lead (DDSL)	Sharon Sverdloff	01453 821293	sharon@aegisuk.net
Chair of Trustees	Priya Bhandari Mitchell		info@aegisuk.net
LSP	Gloucestershire Safeguarding Children Partnership		GSCP@gloucestershire.gov.uk
LADO	Allegations Management Team		amadmin@gloucestershire.gov.uk

Child Protection Principles

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

AEGIS is an association for guardianship organisations. To become a member, guardianship organisations must undergo a stringent accreditation process. Part of this process is seeking the views of students, schools*, parents* and homestays*. If during our investigations a safeguarding concern is highlighted, we are duty bound to share this information with the relevant external agencies.

(* gold membership involves seeking the views of parents, schools and homestays via questionnaires and meetings. References from schools are sought during the standard AEGIS accreditation.)

AEGIS receives many calls and emails from parents, agents, schools, and guardianship organisations throughout the year. Some may highlight a safeguarding concern about an organisation (whether a member or not). Where this

is the case, AEGIS will share this information with the relevant external agencies in line with the procedures outlined below.

AEGIS expects all members to have suitable arrangements in place for safeguarding, including for training staff, volunteers, and homestays, and for identifying and handling concerns. All members will have a DSL and most have a DDSL. AEGIS does not get involved in investigating safeguarding concerns that have been raised with an organisation's DSL, however a guardianship organisation's safeguarding processes will be looked at as part of the accreditation/ re-accreditation process.

Safeguarding students is the responsibility of us all. AEGIS has procedures in place that enable child protection concerns and incidents to be dealt with promptly and effectively and in line with relevant legislation.

AEGIS is committed to safeguarding student welfare and undertakes rigorous checks on all who work with us and member guardianship organisations. We expect all staff and guardianship organisations to share this commitment.

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

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

The purpose of AEGIS is to safeguard the welfare of international students studying at schools, colleges and universities in the UK, making them feel safe, welcome and cared for. Through our rigorous accreditation process, we provide peace of mind that those offering guardianship services to these students meet the very highest standards of care. In pursuit of this aim, AEGIS undertakes the following:

1. We ensure that we lead from the top by ensuring that our trustees and CEO have the appropriate safeguarding knowledge and involvement in the procedures we have in place. This includes having oversight of arrangements;
2. Training is provided for staff to a level appropriate for their role (see training section below);
3. We promote an environment of trust, openness and clear communication so that student welfare, safety and pastoral care is recognised as the top priority;
4. We respond to any reported allegation or suspicion of child abuse in accordance with the AEGIS procedures as outlined below;
5. We ensure that all AEGIS personnel and external contractors offering outsourced inspection services are recruited using safer recruitment practices and are formally screened through the completion of an enhanced DBS check;
6. We maintain links with the appropriate agencies who have a statutory responsibility to deal with child welfare and child protection concerns.

Supporting procedures

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

- Whistleblowing Policy
- Complaints Policy

- AEGIS Grievance Procedure

Government guidance

[Keeping Children Safe in Education](#)

[Working Together to Safeguard Children](#)

Keeping Children Safe in Education

Part one of Keeping Children Safe in Education provides an overview for staff who are working with children. This is written with schools and colleges in mind, but much of the information is relevant to AEGIS staff, trustees and contracted inspectors. AEGIS advises all staff who come into contact with children (including virtual contact) to have read Part One of this document. This can be found here *Keeping children safe in education 2025 - part one* (publishing.service.gov.uk) *Keeping children safe in education 2025 - part one* (publishing.service.gov.uk)

Annex A of Keeping Children Safe in Education is a condensed version of Part one of Keeping Children Safe in Education. AEGIS advises all staff who do not directly work with children to read this document instead of part one.

Definitions

Term	What this means
Safeguarding and promoting the welfare of children	protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; taking action to enable all children to have the best outcomes.
Child Protection	a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Designated Safeguarding Lead (DSL)	the person identified as taking the lead in safeguarding matters in an organisation. This person (and any deputy) will be trained to a higher level.
Prevent	the name given to part of the government's strategy to prevent terrorism by reducing the possibility of radicalisation.
Local Safeguarding Partnership (LSP)	formerly Local Safeguarding Children Board (LSCB) and consisting of the local authority, the clinical commissioning group within the local authority and the chief office of police within the local authority.
LADO	Local Authority Designated Officer (LADO) coordinates all allegations and concerns made against a person who works with children.
Children	includes everyone under the age of 18.

Abuse, neglect and exploitation

(Taken from Keeping Children Safe in Education 2025)

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

If staff or contracted inspectors are unsure, they should always speak to the DSL or deputy.

Types of abuse and neglect

(Taken from Keeping Children Safe in Education 2025)

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

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

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

(For specific types of safeguarding issues, please refer to pages 13-17 of Keeping Children Safe in Education, as well as Annex B of the same document.)

Signs of Abuse and Neglect

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

Common signs

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

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

These signs don't necessarily mean that a child is being abused, there could be other things happening in their life which are affecting their behaviour – but we can help you to assess the situation. You may also notice some concerning behaviour from adults who you know have children in their care, which makes you concerned for the child/children's safety and wellbeing.

Indicators of Physical Abuse

Bumps and bruises don't always mean a child is being physically abused. All children have accidents, trips and falls. And there isn't just one sign or symptom to look out for. But it's important to be aware of the signs. If a child regularly has injuries, there seems to be a pattern to the injuries or the explanation doesn't match the injuries, then this should be reported.

Physical abuse symptoms include:

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

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

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

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

- swelling
- bruising
- fractures
- being extremely sleepy or unconscious
- breathing problems
- seizures
- vomiting
- unusual behaviour, such as being irritable or not feeding properly

Indicators of Emotional Abuse

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

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

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

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

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

Indicators of Sexual Abuse

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

Emotional and Behavioural signs

- Avoiding being alone with or frightened of people or a person they know
- Language or sexual behaviour you wouldn't expect them to know

- Having nightmares or bed-wetting
- Alcohol or drug misuse
- Self-harm
- Changes in eating habits or developing an eating problem

Physical Signs

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

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

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

Indicators of Neglect

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

Poor appearance and hygiene

- being smelly or dirty
- being hungry or not given money for food
- having unwashed clothes
- having the wrong clothing, such as no warm clothes in winter

Health and development problems

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

Housing and family issues

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

Change in behaviour

- becoming clingy

- becoming aggressive
- being withdrawn, depressed or anxious
- changes in eating habits
- displaying obsessive behaviour
- finding it hard to concentrate or take part in activities
- missing school
- showing signs of self-harm
- using drugs or alcohol

Procedures

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

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

Actions to be followed if there are concerns about a child or young person cared for by a guardianship organisation/ how a guardianship organisation has handled a safeguarding concern.

All staff members have a duty to identify and respond to suspected / actual abuse or disclosures of abuse. Any member of staff who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the DSL (or, in their absence, the DDSL).

- Where there is risk of immediate harm, concerns will be referred immediately by telephone to the Police and/or the relevant LSP. The DSL of the relevant guardianship organisation will be informed if appropriate.
- Less urgent concerns or requests for support, including for Early Help, will be sent by the AEGIS DSL to the DSL of the relevant guardianship organisation to be handled under the guardianship organisations own safeguarding policies and procedures.
- The DSL may also seek advice from the relevant authority’s Children’s Social Care or another appropriate agency about a concern if they are unsure of how to respond to it.
- Where appropriate, the DSL will refer any safeguarding concerns that relate to an incident whilst a student was in the care of a guardian to the DSL of the guardianship organisation concerned. Procedures to follow in the event of allegations made against a member of guardianship organisation staff, homestay or volunteer are outlined in the following section.
- The DSL will refer any safeguarding concerns that relate to an incident in school to the school as well as the guardianship organisation’s DSL. Concerns will be referred to the school DSL. If an allegation is made against a member of school staff, the DSL will check the school policy to see who to refer such matters to. This is usually the Head of the School. If the allegation involves the Head, then usually the chair of governors should be informed.
- Where a concern is not seen to reach the threshold for a referral, the DSL will keep the concern on file and will monitor the situation. The DSL is aware that they can contact the relevant LSP for advice to check whether an incident meets the threshold. Should the concern escalate, a referral will be made to the relevant LSP.
- If a member of staff continues to have concerns about a child and feels the situation is not being addressed or does not appear to be improving, the staff member should press for re- consideration of the case with the DSL.
- If, for any reason, the DSL (or DDSL) is not available, or you do not feel that your concern is being taken seriously, this should not delay appropriate action being taken. Any individual may refer to the relevant LSP or Police where there is suspected or actual risk of harm to a child. The contact details are included at the beginning of this policy.

- Full records of reports and action taken will be maintained by the DSL and securely stored in a specific safeguarding file.

Allegations of abuse against a member of staff, trustee, contracted inspector or an adult working for a guardianship organisation

Allegations that meet the threshold

- This guidance should be followed where it is alleged that anyone working for AEGIS has:
 - behaved in a way that has harmed a child, or may have harmed a child; and/or
 - possibly committed a criminal offence against or related to a child; and/or
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children (known as transferable risk).
- In the event that there is an allegation against a member of staff, AEGIS will follow the guidance in the most recent version of Keeping Children Safe in Education Part 4.
- Allegations against a member of staff should be directed to the CEO of AEGIS who will act as “case manager”. The CEO must contact the LADO immediately and follow their advice. They must not investigate themselves. If the allegation is about the CEO, please contact the Chair of Trustees. Alternatively, the LADO may be contacted directly.
- AEGIS will report promptly to the DBS any person whose services are no longer used for regulated activity because they have caused harm or posed a risk of harm to a child.
- Any historical allegations will be referred to the police.

Allegations that do not meet the threshold

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

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

AEGIS expects members of staff, trustees, contracted inspectors or any adult working for a guardianship organisation to self-report any situation to the CEO which could appear compromising or be misconstrued, or where behaviour has fallen below expected standards.

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

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- Examples of such behaviour could include, but are not limited to:
 - being over friendly with children;
 - taking photographs of children on their mobile phone;
 - engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
 - using inappropriate sexualised, intimidating or offensive language.

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

ultimately intended to enable abuse.

AEGIS is conscious of its duty of care to students and will always act, including if alerted to the possibility of abuse. The notification and prompt handling of all concerns about adults is fundamental to safeguarding students. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Our separate Low Level Concern Policy outlines how we will manage and record any low-level concerns and take appropriate action to safeguard children.

Allegations made against a guardianship organisation (Staff, Homestay or Volunteer)

If an allegation is made against a member of guardianship organisation staff, homestay or volunteer, where possible, the DSL will check the guardianship organisation policy or contact the organisation to see who to refer such matters to. This is usually the owner/ director of the guardianship organisation. If concerns suggest that a guardianship organisation is not handling an allegation against a member of staff or homestay appropriately, the AEGIS DSL may contact the LADO directly if the concern meets the threshold.

How to receive a disclosure from a child or young person

- Victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.
- Reassure the child and listen carefully – it is important that they know you believe them.
- Do not say that you will not say anything to anyone – in fact you have a duty to disclose this to another person so do not promise confidentiality.
- Make sure you take detailed notes, write everything down. If you are unable to take notes at the time, you should do so as soon as you are able.
- Ask open questions if appropriate, do not lead the conversation to find out what has happened. Use words such as tell me, explain or describe, and allow the student to speak.
- Avoid words such as what, why, how when – these will be asked by the relevant agency if appropriate.
- Ensure that you notify the police by calling 999 if you believe that the young person is at immediate or serious risk of harm.
- Contact the DSL [Yasemin Wigglesworth] or DDSL [Sharon Sverdloff] as soon as practicable and in any case within 24 hours.
- If the disclosure is made out of hours, please use the emergency phone number [07429 297591].

How to receive a disclosure from a concerned adult

- The person should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.
- Reassure the person and listen carefully – it is important that they know you believe them.
- Do not say that you will not say anything to anyone – in fact you have a duty to disclose this to another person so do not promise confidentiality.
- Make sure you take detailed notes, write everything down. If you are unable to take notes at the time, you should do so as soon as you are able.
- Ask open questions if appropriate, do not lead the conversation to find out what has happened. Use words such as tell me, explain or describe, and allow the person to speak.
- Avoid words such as what, why, how when – these will be asked by the relevant agency if appropriate.
- Ensure that you notify the police by calling 999 if you believe that a young person is at immediate or serious risk of harm.
- Contact the DSL [Yasemin Wigglesworth] or DDSL [Sharon Sverdloff] as soon as practicable and in any case within 24 hours.

- If the disclosure is made out of hours, please use the emergency phone number [07429 297591].

Issues identified raised via the AEGIS accreditation questionnaires or meetings

Where a safeguarding concern is identified in a response to the AEGIS accreditation questionnaires or meetings with students, homestays and schools, the following procedure should be followed:

- Where there is a specific concern disclosed in a meeting held by a Supporting Inspector, or highlighted in the questionnaires, then contact should be made with the AEGIS DSL [Yasemin Wigglesworth] or DDSL [Sharon Sverdloff] as soon as practicable and in any case within 24 hours. The DSL/ Director (if allegation is against a member of staff) of the guardianship organisation should be contacted if this will not put the student at risk, otherwise the concern should be passed to external agencies. The guardianship organisation should then follow their safeguarding policy.
- If the lead Inspector receives a disclosure in the course of an inspection, they should make the AEGIS DSL [Yasemin Wigglesworth] or DDSL [Sharon Sverdloff] aware as soon as practicable and in any case within 24 hours. The DSL/ Director (if allegation is against a member of staff) of the GO should be contacted if this will not put the student at risk, otherwise the concern may need to go to external agencies. The guardianship organisation should then follow their safeguarding policy. The lead inspector should make contact with the guardianship organisation, and the AEGIS DSL should be made aware.
- Where concerns have been raised by AEGIS, dealt with (as above) and then the lead inspector informed (i.e. they have not received the disclosure directly), the lead inspector will follow up in the meeting whether there have been any safeguarding concerns and how they were handled/ recorded.
- If concerns suggest that a guardianship organisation is not handling an allegation against a member of staff or homestay appropriately, the AEGIS DSL may contact the LADO directly if the concern meets the threshold.
- The lead inspector will check procedures in place that relate to the concern to satisfy themselves that appropriate systems are in place to help keep students safe. If they are not, the AEGIS DSL will be notified, and action will be taken. This could be setting conditions for membership, ongoing monitoring, or suspension. Lead inspectors will not investigate the specific concern.
- In questionnaires, where students say they do not feel safe but do not give a reason, the guardianship organisation should be asked to contact their students to encourage them to let someone know about any concerns or worries and the following wording is suggested:
- We are writing to you, and each of our students, to see how you are. It's important to remember that if you are worried or concerned about anything, at school or at your homestay, that you talk to a trusted adult. You are always welcome to speak to us or a member of staff at school. Someone is always available to listen to you and will be able to help.
- Ensure that you notify the police by calling 999 if you believe that a young person is at immediate or serious risk of harm.

Sharing Safeguarding Information

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

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

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and General Data Protection Regulations are not

a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

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

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

Role of DSL and DDSL

The DSL will take lead responsibility for safeguarding and child protection (including online safety). This is explicit in the role holder's job description. This person has the appropriate status and authority within the guardianship organisation to carry out the duties of the post.

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

The designated safeguarding lead is expected to:

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

Contact Details for the DSL and DDSL

Role	Name	Telephone Number	Email
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DSL	Yasemin Wigglesworth	01453 821293	yasemin@aegisuk.net
DDSL	Sharon Sverdloff	01453 821293	sharon@aegisuk.net

Prevent

AEGIS has a separate policy that outlines our procedure for Anti-Radicalisation and Prevent.

Prevent Lead Contact Details

Role	Name	Telephone Number	Email
Prevent Lead	Yasemin Wigglesworth	01453 821293	yasemin@aegisuk.net

Record keeping

AEGIS will keep full records of any safeguarding concern reported to them. Safeguarding records will be stored securely and separately to the general files. These will be stored confidentially by the DSL in either a locked cabinet (hard copies) or a password protected file. Only the DSL and DDSL will have access to these files.

Records will be detailed and accurate (either handwritten or using appropriate secure online software). These will include all concerns even if there is no need to make an immediate referral and record the rationale for decisions made and action taken. Copies of any correspondence or notes from conversations with the LSP, guardianship organisation DSL, school DSL or other external agency will be included in the file.

In summary, records should include:

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

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

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

Training and Updates

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

DSL and DDSL

The DSL and DDSL will attend suitable face-to-face training as approved or provided by the Local Safeguarding Partners (LSP), AEGIS or the NSPCC. This training will be renewed every two years.

Other staff, trustees and contracted inspectors

All other members of staff will receive appropriate safeguarding training to an appropriate basic awareness level (previously referred to as level 1), every three years. This will either be done online or in person. Members of staff who have already completed suitable safeguarding training for another provider that is still in date will not be required to re-train. In this case the DSL will still need to ensure that the person fully understands AEGIS' own procedures for safeguarding.

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

Whistleblowing

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

Local Safeguarding Partnerships (LSPs)

AEGIS will liaise with the relevant Local Safeguarding Partnership (LSP) and work in partnership with other agencies in line with *Working Together to Safeguard Children*. Guardianship organisations have their own safeguarding policies. These are often available on their website or made available to all relevant stakeholders.

Partner schools also have their own safeguarding policies. These can be found on their website and will include the contact details for their LSP.

AEGIS recognises that safeguarding concerns need to be referred to the relevant LSP depending on where the guardianship organisation and/or student is located. AEGIS will contact the relevant LSP and follow their procedures. The website below provides a link to all of the LSPs in the country:

[Boards and Partnerships Home \(safecic.co.uk\)](https://safecic.co.uk/Boards-and-Partnerships-Home)

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

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

AEGIS is aware that in **Scotland**, for a non-emergency referral or concern they can contact the local children's social work team. Their contact details can be found on the website for the local authority the child lives in, and in the table below. Alternatively they can contact the local office of Scottish Children's Reporter Administration: [Contact Us - SCRA](#)

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

Liaison with parents/ agents/ guardianship organisations and partner schools

AEGIS may be required to share confidential safeguarding information with the DSL of the guardianship organisation and/or school or college that the student attends. All schools and colleges have their own safeguarding and child protection policies that outline their procedures. These can be found on their websites.

Whilst AEGIS will work openly with parents as far as possible, it reserves the right to contact the LSP or the police, without notifying parents if this is believed to be in the child's best interests.

AEGIS will not usually share safeguarding information with agents unless it is necessary to safeguard the student. In this case information will be provided on a need-to-know basis and on the understanding that it should be kept strictly confidential.

Further Detail on specific types of abuse

Please refer to annex B of [Keeping children safe in education 2025 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk) for further details on the following types of abuse:

- Child abduction and community safety incidents Page 150

- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) Page 150
- County lines Page 151
- Children and the court system Page 152
- Children who are absent from education Page 153
- Children with family members in prison Page 153
- Cybercrime Page 153
- Domestic abuse Page 154
- Homelessness Page 156
- Mental health Page 156
- Modern Slavery and the National Referral Mechanism Page 157
- Preventing radicalisation Page 157
- The Prevent duty Page 158
- Channel Page 158
- Sexual violence and sexual harassment between children in schools and colleges Page 160
- Serious Violence Page 160
- So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage) Page 161
- FGM Page 162
- FGM mandatory reporting duty for teachers Page 162
- Forced marriage Page 163
- Additional advice and support Page 163

Review

AEGIS may be required to share confidential safeguarding information with the DSL of the guardianship organisation and/or school or college that the student attends. All schools and colleges have their own safeguarding and child protection policies that outline their procedures. These can be found on their websites.

We are committed to reviewing our policy and good practice annually. This policy was last reviewed on: 9th September 2025

Signed:

AEGIS DSL

Date:9th September 2025



Appendix 1: Incident Form

CHILD PROTECTION RECORD – Report of a Concern

Date of record:	
Date of incident:	

Name of referrer:		Role of referrer:	
Student name:			
Name of GO:			
Details of concern:	● use initials for other children / young people involved, unless there is a specific need to name them in full ● contemporaneous notes, if taken, may be attached to this form		
Reported to:		Role of person reported to:	

<i>Signed:</i>	
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For DSL/ DDSL use:

Action taken:		Advice sought: (from whom and what was advice given)	
Concern / referral discussed DSL of GO /with parent / carer?		If not, state reasons why – if yes, note discussion with DSL of GO	
Have parents/ carer been made aware (by GO or AEGIS?)		If not, state reasons why – if yes, note discussion with Parent	
Referral made:		If not, state reasons why – if yes, record to whom and any action agreed	
Feedback to referring person:			By whom
Response to / action taken with GO/ student:			By whom
Name and contact number of DSL of GO/ student's guardian:			
Other notes / information / concerns:			

<i>Any other action required:</i>	
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