

# Policies

# Content

## [Safeguarding and Child Protection Policy](#)

[Policy Statement](#)

[Key Safeguarding Contact Details](#)

[Child Protection Principles](#)

[Supporting procedures](#)

[Definitions](#)

[What is abuse and neglect?](#)

[Types of abuse and neglect](#)

[Signs of Abuse and Neglect](#)

[Indicators of Physical Abuse](#)

[Indicators of Emotional Abuse](#)

[Indicators of Sexual Abuse](#)

[Indicators of Neglect](#)

[Procedures](#)

[Sharing Safeguarding Information](#)

[Role of DSL and DDSL](#)

[Prevent](#)

[Record keeping](#)

[Training and updates](#)

[Whistleblowing](#)

[Local Safeguarding Partnerships \(LSPs\)](#)

[Liaison with parents / agents and partner schools](#)

[Further Detail on specific types of abuse](#)

[Safeguarding issues](#)

[Child on child abuse](#)

[Serious violence](#)

[Children missing from education](#)

[Child sexual exploitation](#)

[Child criminal exploitation: county lines](#)

[Honour-based violence](#)

## [Mental Health Support Policy](#)

[Policy statement](#)

[Policy aims](#)

## [Welfare, Health and Safety Policy](#)

[Policy statement](#)

## [Procedure](#)

### [Private Fostering Compliance Policy](#)

[Policy statement](#)

[Aims and objectives](#)

[Definitions](#)

[Principles](#)

[Local authority role in safeguarding and promoting welfare](#)

### [Bullying including Cyberbullying and E-Safety Policy](#)

[Policy Statement](#)

[Contact Details](#)

[E-Safety. Areas of risk](#)

[Procedures](#)

[Related policies and procedures](#)

### [Anti-Radicalisation Policy](#)

[Policy Statement](#)

[Legislation](#)

[Policy](#)

[Working with partners to protect children](#)

[Awareness Training for Staff](#)

[Procedure for reporting concerns](#)

### [Missing Student Procedure](#)

[Statement](#)

[Definitions](#)

[Supporting Reference Documents](#)

[Procedure](#)

[Process and Response – report of a missing child](#)

[Process and Response – report of an absent child](#)

[Informing the media](#)

[The Return](#)

[Children Missing Education](#)

### [Emergency Procedure](#)

[Statement](#)

[Emergency Procedure](#)

[Specific scenarios](#)

[Emergency Contact Details](#)

[Whistleblowing Policy and low-level concerns](#)

[Policy Statement](#)

[Policy](#)

[Contact Details](#)

[Complaints Policy](#)

[Policy Statement](#)

[Complaints Procedure](#)

[Staff Code of Conduct](#)

[Code of Conduct](#)

[Safer Recruitment Policy](#)

[Policy Statement](#)

[Data Protection Policy](#)

[Policy Statement](#)

[Policy](#)

[Privacy Policy](#)

[Information We Collect](#)

[Student Behaviour Code of Conduct](#)

[Statement](#)

[Behaviour Code of Conduct](#)

## Safeguarding and Child Protection Policy

### Policy Statement

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

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

This policy is based on guidance from [KCSIE 2024](#) and [Working Together to Safeguard Children 2023](#). It also makes use of guidance from the NSPCC website.

### Key Safeguarding Contact Details

Role	Name	Contacts
Designated Safeguarding Lead (DSL)	Kasha Handcock	Phone: +44 (0)7824 44 95 40 Email: <a href="mailto:k.handcock@iqconsultancy.uk">k.handcock@iqconsultancy.uk</a>
Deputy Designated Safeguarding Lead (DDSL)	Ksenia Soldatikhina	Phone: +44 (0)7522 84 80 26 Email: <a href="mailto:k.soldatikhina@iqconsultancy.uk">k.soldatikhina@iqconsultancy.uk</a>
<b>IQ Consultancy LTD</b>  24-Hour emergency contact	Kasha Handcock  Ksenia Soldatikhina	Email: <a href="mailto:k.handcock@iqconsultancy.uk">k.handcock@iqconsultancy.uk</a>  Phone: +44 (0)7522 84 80 26
LSP	Tower Hamlets	Phone: +44 (0)20 7364 5606 / 5601 Email: <a href="mailto:MASH@towerhamlets.gov.uk">MASH@towerhamlets.gov.uk</a>

LADO	Verlyn Munro	Phone: +44 (0)207 364 0677 Email: <a href="mailto:LADO@towerhamlets.gov.uk">LADO@towerhamlets.gov.uk</a>
------	--------------	---

## Child Protection Principles

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

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

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

Safeguarding students is the responsibility of us all, including full-time, part-time, contracted,

agency and volunteer staff including those who do not have cause to come into direct or regular contact with students in order to carry out their daily duties. It also applies to those who provide homestay accommodation for our students and third party contractors.

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 including for example:

- physical, emotional, sexual abuse or neglect;
- domestic abuse;
- child sexual exploitation;
- radicalisation and extremism;
- female genital mutilation;
- online abuse;
- bullying and cyberbullying.

We aim to ensure that the students in our care experience at all times a caring and secure environment in which they feel safe, respected and valued. In pursuit of this aim, **IQ Consultancy LTD** undertakes the following:

1. Training is provided for all staff to a level appropriate for their role (see training section below).
2. We promote an environment of trust, openness and clear communication between students, school and **IQ Consultancy LTD** staff and our Homestays, so that student welfare, safety and pastoral care is recognised as the top priority.
3. We respond to any reported allegation or suspicion of child abuse in accordance with the IQ Consultancy LTD procedures as outlined below.
4. We ensure that all guardianship personnel, homestays and personnel offering outsourced services who come into direct contact with students in our care, are recruited using safer recruitment practices and are formally screened through the completion of an enhanced DBS check.
5. We maintain links with the appropriate agencies who have a statutory responsibility to deal with child welfare and child protection concerns. If you have any reason to believe that a child in your care is suffering from any form of abuse or neglect then please report it immediately in confidence to the DSL or DDSL using the contact details listed in this policy.

## Supporting procedures

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

- Anti-bullying and (including cyber-bullying) policy

- Anti-Radicalisation Policy
- E-safety Policy
- Missing Student Policy
- Safer Recruitment Policy
- Staff Code of Conduct
- Whistleblowing Policy and low-level concerns
- Emergency procedure (This includes information on the guardianship organisation's approach to foreseeable emergencies, such as a pandemic)

## Definitions

Term	What this means
Safeguarding and promoting the welfare of children	is defined as: <ul style="list-style-type: none"> <li>• protecting children from maltreatment;</li> <li>• preventing impairment of children's health or development;</li> <li>• ensuring that children grow up in circumstances consistent with the provision of safe and effective care;</li> <li>• taking action to enable all children to have the best outcomes.</li> </ul>
Child Protection	Is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Designated Safeguarding Lead (DSL)	This is the person identified as taking the lead in safeguarding matters in an organisation. This person (and possibly a deputy) will be trained to a higher level.
Prevent	Prevent is the name given to part of the government's strategy to prevent terrorism by reducing the possibility of radicalisation.



Local Safeguarding Partnership (LSP)	Formerly Local Safeguarding Children Board (LSCB) and consisting of the local authority, the clinical commissioning group within the local authority and the chief office of police within the local authority.
LADO	The role of the Local Authority Designated Officer (LADO) is to coordinate all allegations and concerns made against a person who works with children.
Children	'Children' includes everyone under the age of 18.

## What is abuse and neglect?

- Knowing what to look for is vital to the early identification of abuse and neglect. All staff and homestays should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff or homestays are unsure, they should always speak to the DSL (or DDSL).
- All staff and homestays should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

## Types of abuse and neglect

(Taken from *Keeping Children Safe in Education 2024*)

**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.

## Signs of Abuse and Neglect

The following information has been taken from the [NSPCC website](#).

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;
- drop hints and clues about the abuse.

### Indicators of Neglect

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

#### Poor appearance and hygiene

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

#### Health and development problems

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

### **Housing and family issues**

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

### **Change in behaviour**

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

## Procedures

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

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

- All staff members have a duty to identify and respond to suspected / actual abuse or disclosures of abuse. Any member of staff or volunteer who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the DSL.
- Where there is risk of immediate harm, concerns will be referred immediately by telephone to the relevant LSP or the Police.
- Less urgent concerns or requests for support, including for Early Help, will be sent by the DSL to relevant LSP.
- The DSL may also seek advice from Social Care or another appropriate agency about a concern, if we are unsure how to respond to it.
- Where a concern is not seen to reach the threshold for a referral, the DSL will keep the concern on file and will monitor the situation. Should the concern escalate, a referral will be made to the LSP.
- Wherever possible, we will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to consult with the LSP and/or Police for advice on when to share information with parents / carers.
- If a member of staff 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 concerned should press for reconsideration of the case with the DSL.
- If, for any reason, the DSL is not available, or you do not feel that your concern is being taken seriously, this should not delay appropriate action being taken. Any individual may refer to the LSP or Police where there is suspected or actual risk of harm to a child. The contact details are included at the beginning of this policy.
- Full records of reports and action taken will be maintained by the DSL and securely stored in a specific safeguarding file.

### **Allegations of abuse against a member of staff or homestay**

- If the allegation is made about a member of the guardianship organisation staff or

homestay, the DSL must contact the LADO immediately and follow their advice. They **must not** investigate themselves. If the allegation is about the DSL, please contact the LADO and follow the advice as above.

- **IQ Consultancy LTD** 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.

### How to receive a disclosure from a child or young person

- Reassure the child and listen carefully – it is important that they know you believe them.
- Do not say you will not say anything to anyone – in fact you have a duty to disclose this to another person so do not promise confidentiality
- Make sure you take detailed notes, write everything down
- 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 Kasha Handcock at **+44 (0)7824 44 95 40** as soon as practicable and in any case within 24 hours
- If the disclosure is made out of hours, please use the emergency phone number **+44 (0) 7522 84 80 26**.

### Sharing Safeguarding Information

Information will be shared with guardianship organisation staff, homestays and the school's DSL (of the school that the student attends) who 'need to know'.

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 guardianship organisation staff, homestays or the DSL of the school that the student attends on a need to know basis.



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

## Role of DSL and DDSL

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

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

### The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff and homestays who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff and homestays who make referrals to the Channel programme;
- 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 Director of IQ Consultancy LTD to inform of issues;
- liaise with staff and homestays on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies;
- act as a source of support, advice and expertise for all staff;
- ensure the guardianship organisation's child protection policies are known, understood and used appropriately;
- ensure the child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the Director regarding this;
- ensure the child protection policy is available for all relevant parties on IQ Consultancy LTD website;
- 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	Contacts
Designated Safeguarding Lead (DSL)	Kasha Handcock	Phone: +44 (0)7824 44 95 40 Email: <a href="mailto:k.handcock@iqconsultancy.uk">k.handcock@iqconsultancy.uk</a>
Deputy Designated Safeguarding Lead (DDSL)	Ksenia Soldatikhina	Phone: +44 (0)7522 84 80 26 Email: <a href="mailto:k.soldatikhina@iqconsultancy.uk">k.soldatikhina@iqconsultancy.uk</a>
24-Hour emergency contact	Kasha Handcock	Phone: +44 (0)7824 44 95 40 Email: <a href="mailto:k.handcock@iqconsultancy.uk">k.handcock@iqconsultancy.uk</a>

## Prevent

**IQ Consultancy LTD** has a separate policy that outlines our procedure for Anti-Radicalisation and Prevent. This can be found on IQ Consultancy LTD website.

### Prevent Lead Contact Details

Role	Name	Contacts
Prevent Lead	Kasha Handcock	Phone: +44 (0)7824 44 95 40 Email: <a href="mailto:k.handcock@iqconsultancy.uk">k.handcock@iqconsultancy.uk</a>

## Record keeping

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

Records will be detailed and accurate (either handwritten or using appropriate secure online software). These will include all concerns about a student even if there is no need to make an

immediate referral and record the rationale for decisions made and action taken. Copies of any correspondence or notes from conversations with the LSP, school DSL or other external agency will be included in the file.

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

## Training and updates

IQ Consultancy LTD 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.

All staff, volunteers and Host Families are encouraged to read [Keeping Children Safe in Education](#) (Part 1 and Annexe A).

## 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 three years.

## Other staff

All other members of staff, volunteers and homestays will receive appropriate safeguarding training to an appropriate basic awareness level (previously referred to as level 1), every three years. This will either be done online or in person. Homestays receive training with Hosts International. Members of staff and volunteers 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 **IQ Consultancy LTD** 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 and low-level concerns

**IQ Consultancy LTD** has a separate policy that outlines the whistleblowing and low-level concerns procedures. These protect staff members who report colleagues they believe are doing something wrong or illegal, or who are neglecting their duties.

**IQ Consultancy LTD** requires all staff and host families to proactively self-report any situation

that could appear compromising, be open to misinterpretation, or reflect behaviour falling below the standards outlined in the organisation's Code of Conduct. The company actively promotes a culture of openness, responsibility, and safeguarding awareness.

## Local Safeguarding Partnerships (LSPs)

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

Partner schools have their own safeguarding policies. These can be found on their website and will include the contact details for their LSP. **IQ Consultancy LTD** recognises that if any safeguarding concerns occurred whilst a student was in a homestay that was out of the schools county then a different/additional LSP arrangement would be required as well. In this case, **IQ Consultancy LTD** will contact the relevant LSP and follow their procedures. Details can be found on the [Local Authority website](#). The website provides a link to all of the LSPs in the country.

In the event of any contact information difficulties then **IQ Consultancy LTD** should call the police as they are one of the partners.

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

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

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

## Contact Details for LSPs and LADOs across the areas that IQ Consultancy LTD operates

Area	Role	Contacts
<b>Oxfordshire</b>	LADO Alison Beasley  Multi-Agency Safeguarding Hub (MASH)	Phone:  01865 810603  Email:  <a href="mailto:lado.safeguardingchildren@oxfordshire.gov.uk">lado.safeguardingchildren@oxfordshire.gov.uk</a>
<b>Cambridgeshire</b>	LADO  Multi-Agency Safeguarding Hub (MASH)	Phone:  01223727967  Email:  <a href="mailto:LADO@cambridgeshire.gov.uk">LADO@cambridgeshire.gov.uk</a>
<b>Brighton and Hove</b>	LADO  Multi-Agency Safeguarding Hub (MASH)	Phone:  01273 335905 01273290400  Email: <a href="mailto:ladoenquiries@brighton-hove.gov.uk">ladoenquiries@brighton-hove.gov.uk</a> <a href="mailto:FrontDoorforFamilies@brighton-hove.gov.uk">FrontDoorforFamilies@brighton-hove.gov.uk</a>
<b>Kent</b>	LADO  Kent Safeguarding Children Multi- Agency Partnership	Phone:  03000 41 11 11  Email: <a href="mailto:kscmp@kent.gov.uk">kscmp@kent.gov.uk</a> <a href="mailto:Frontdoor@kent.gov.uk">Frontdoor@kent.gov.uk</a>

## Liaison with parents / agents and partner schools

- The guardianship organisation may be required to share confidential safeguarding information with the DSL of the school or college that the student attends. When a student moves school or college, safeguarding information may be shared with the DSL of the new school. All schools and colleges have their own safeguarding and child protection policies that outline their procedures. These can be found on their websites.
- Whilst the guardianship organisation will work openly with parents as far as possible, it reserves the right to contact the LSP or the police, without notifying parents if this is believed to be in the child's best interests.
- **IQ Consultancy LTD** 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.
- **IQ Consultancy LTD** agrees to self-report to AEGIS any significant safeguarding concerns or incidents that may appear compromising, be open to misinterpretation, or indicate a breach of expected professional standards. The guardianship organisation recognises its responsibility to uphold the highest levels of safeguarding and transparency at all times.

## Further Detail on specific types of abuse

The following information is taken from *Keeping Children Safe in Education (2024)*. Please refer to [this document](#) for further details, including additional types of abuse.

## Safeguarding issues

All staff and homestays should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

## Child-on-child abuse

All staff and homestays should be aware that children can abuse other children (often referred to child-on-child abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- hate incidents and hate crimes – which may also include an online element.
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse') – which may also include an online element.

- racism – occurs when a person is treated less favorably because of their skin colour, nationality, ethnicity, or cultural group. Racist behaviour can include verbal abuse, physical attacks, exclusion from activities or opportunities and microaggressions, which can be conscious and unconscious. It can occur in person or online.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- online sexual harassment – this may be stand-alone or part of a wider pattern of sexual violence and/or harassment.
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery);
- initiation/hazing type violence and rituals.

### **Actions to be followed if there are concerns**

- All staff members have a duty to identify and respond to suspected / actual abuse or disclosures of abuse. Any member of staff or volunteer who receives a disclosure or allegation of abuse, or suspects that abuse may have occurred must report it immediately to the DSL.
- Where there is risk of immediate harm, concerns will be referred immediately by telephone to the relevant LSP or the Police.
- Less urgent concerns or requests for support, including for Early Help, will be sent by the DSL to relevant LSP.
- The DSL may also seek advice from Social Care or another appropriate agency about a concern, if we are unsure how to respond to it.
- Where a concern is not seen to reach the threshold for a referral, the DSL will keep the concern on file and will monitor the situation. Should the concern escalate, a referral will be made to the LSP.
- Wherever possible, we will share any safeguarding concerns, or an intention to refer a child to Children's Social Care, with parents or carers. However, we will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions, it may be necessary to consult with the LSP and/or Police for advice on when to share information with parents / carers.

- If a member of staff 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 concerned should press for reconsideration of the case with the DSL.
- If, for any reason, the DSL is not available, or you do not feel that your concern is being taken seriously, this should not delay appropriate action being taken. Any individual may refer to the LSP or Police where there is suspected or actual risk of harm to a child. The contact details are included at the beginning of this policy.
- Full records of reports and action taken will be maintained by the DSL and securely stored in a specific safeguarding file.

## Serious violence

All staff and homestays should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

## Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should contact the students' school or college should they suspect a student is missing from education. The school or college will have a procedure for reporting this absence.

## Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.



### **Like all forms of child sex abuse, child sexual exploitation:**

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

### **Some of the following signs may be indicators of child sexual exploitation:**

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss school or education or do not take part in education.

## **Child criminal exploitation: county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when

the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

### **Like other forms of abuse and exploitation, county lines exploitation:**

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

## **Honour-based violence**

(including Female Genital Mutilation and Forced Marriage)

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

### **Actions**

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. In schools, where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers- if a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### **FGM**

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

### **Forced marriage**

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

### **Domestic Abuse**

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality.

The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial;
- emotional.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

### **Upskirting**

‘Upskirting’ typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.

### **Online safety**

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the

platform that facilitates harm.

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

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults;
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

**IQ Consultancy LTD** recognises the risks posed to students online. Further information can be found in the e-safety and bullying (including cyber-bullying) policies.

## Mental Health Support Policy

### Policy statement

**IQ Consultancy LTD** is committed to supporting the mental health and wellbeing of our students. Our aim is to promote a working culture that is supportive, caring, and respectful.

We want our students to have a voice and to feel listened to. We know culture shock can affect international students, that everyone experiences different life challenges, and that each of us may need help to cope with them sometimes. We understand that anyone and everyone may need additional emotional support. We take responsibility for supporting the children under our care as does anyone who works with us.

### Reasons for this policy

This policy is a guide for overseas parents, schools, host families and IQ Consultancy LTD staff. It outlines our approach to promoting student mental health and wellbeing. It should be read and understood alongside our other relevant policies.

### Policy aims

The aim of our policy is to demonstrate our commitment to the mental health of our staff and students.

We pledge to:

- Ensure that our staff have relevant training in Mental Health Awareness and easy access to information. This will include guidance on signs and symptoms as well as how to talk to students who are suffering with mental health issues. This training will be updated at least every 3 years.

- Ensure that our students know who to contact if they are struggling and feel comfortable sharing any concerns and worries.
- Respect our students as individuals and make them feel valued and listened to.
- Be available to support students who need our help in cooperation with their school.
- Work closely with relevant school staff to ensure any response to a mental health concern is in the best interest of the student.
- Promote an early response to signs of mental health issues amongst our students.

## **IQ Consultancy LTD Mental Health Support Leaders**

If a member of staff, school is concerned about the mental health and wellbeing of a student, then in the first instance they should speak to: The Designated Safeguarding Lead - Kasha Handcock.

If a child presents a medical emergency, then relevant procedures will be followed, including involving the emergency services.

## **Warning Signs**

All staff will be on the lookout for signs that a pupil's mental health is deteriorating. These warning signs should always be taken seriously and staff observing any of these signs should communicate their concerns to the DSL. Possible warning signs include:

- physical signs of harm that are repeated or appear non-accidental;
- changes in eating or sleeping habits;
- increased isolation from friends or family, becoming socially withdrawn;
- changes in activity, energy level or mood;
- changes in attitude in lessons or academic attainment;
- talking or joking about self-harm or suicide;
- abusing drugs or alcohol;
- rapid weight loss or gain
- expressing feelings of failure, hopelessness, worthlessness, anxiety or loss of hope;
- inappropriate clothing, e.g. long sleeves in warm weather;
- secretive behaviour;
- skipping PE or getting changed secretly;

- changes in level of personal hygiene;
- repeated physical pain or nausea with no evident cause;
- an increase in lateness or absenteeism.

Any member of staff who is concerned about the mental health or wellbeing of a pupil should speak to the DSL in the first instance. If there is a fear that the pupil is in danger of immediate harm then the normal safeguarding procedures should be followed. If the pupil presents a medical emergency then the normal procedures for emergency services should be contacted if necessary.

Where a referral to the Child and Adolescent Mental Health Service (CAMHS) is appropriate, this will be led and managed by the DSL in liaison with parents/carers and, where appropriate, the school nurse or the child's GP.

## Managing Disclosures and Confidentiality

If a pupil makes a disclosure about themselves or a peer to a member of staff, that staff member should remain calm, non-judgmental and reassuring.

Staff will focus on the pupil's emotional and physical safety, rather than trying to find out why they are feeling that way or offering advice. This will mean they will listen rather than advise.

Staff will be honest with regards to confidentiality and be clear that it is necessary to pass on concerns about a pupil. This will usually be to the DSL, but staff will explain what information they will share, with whom and why they need to share it.

Parents/carers will be informed of mental health concerns unless there is a safeguarding concern. In this case, our company's policy will be followed.

## Risk Assessments

As part of our company's due consideration and a full risk-assessment parents need to complete and sign the Questionnaire as part of the Guardianship Agreement prior to taking guardianship of a student with mental health issues to ensure that the student's needs can be met.

## Staff awareness training

ALL staff are given sufficient awareness training to recognise the signs of a Mental Health issue and know how to handle it and who to tell.

## Working with schools, parents and medical professionals

We work and cooperate with schools, parents to better support our students.

Where a school contacts us to report a mental health concern with a student, we follow our Emergency Procedure.

We will:

- Ask if the student is in immediate danger of harm. In this case we will insist that the emergency services are called immediately.
- Work together with the school to support the student in the best way possible.
- Ask what level of risk that the student presents to themselves and others.
- Insist that the student is taken to A&E and/or CAHMS or MASH informed if the student is at high risk of harm.
- Remember and take note that children and young people with special educational needs or an existing mental health diagnosis require more professional and immediate support as they are often more vulnerable to mental health issues.
- To remember that only appropriately trained professionals should attempt to make a diagnosis of a mental health issue.
- Inform the parents/carers of the child's mental health issues (unless there is a child protection concern with the parent/carer that directly places the child at further risk of harm where it would not be appropriate).
- Remind schools and parents that as guardians we are not medically trained and cannot replace the care of a medical professional or an NHS crisis team.
- Ask relevant questions and seek the advice of or insist that a medical professional is consulted by the school, if we are asked to remove the student from school.
- Ascertain that the student has been consulted and is happy to leave.
- Request/insist that parents come to take care of their child if necessary.
- Where it is decided that it would be in the student's best interest to stay with a host family, we will risk assess the situation and find the most suitable host family for the student.
- We will provide ongoing support to the student and the host family and keep in regular contact with the relevant school staff and overseas parents.

## Working with medical professionals

We will also liaise with medical professionals to help support our students. This may be CAHMS, hospital staff, school or private therapists, including SEND professionals, the local MASH team and Social Services, SENDCo, Educational Psychologists, GPs.

## Working with homestays

In the event that a student requires emergency accommodation with specific medical or pastoral support, IQ Consultancy Ltd works in partnership with an accredited homestay provider. This provider is able to supply families who have a background in medical or pastoral care and hold valid First Aid certification. These homestays are briefed in advance and are willing to support students with routine medication, including observing and recording that prescribed medication is taken as required. A clear communication line is maintained between the homestay, IQ Consultancy, and the student's parents or guardians throughout.

## If a student discloses mental health issues

Mental health disclosures constitute Child Protection and Safeguarding issues.

Any disclosure should be reported to Kasha Handcock, our DSL immediately.

## Welfare, Health and Safety Policy

### Policy statement

**IQ Consultancy LTD** places the highest priority on ensuring the health and safety of the students in their care. On top of our stringent recruitment procedures, outlined in our safer recruitment policy, we make thorough checks on the accommodation provided by our homestays.

The member of staff responsible for any welfare, health and safety issues is **Kasha Handcock — phone: +44 (0) 782444 9540.**

### Procedure

**IQ Consultancy LTD** will 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 will be conducted and a simple risk assessment of the property undertaken along with a check on the suitability of the accommodation. Comprehensive notes of this visit will be recorded within the homestay file.

**The minimum health and safety checks will be undertaken. These are in line with the AEGIS requirements:**

- Check that the home has a minimum of one smoke alarm to be installed on every storey.
- Check that a carbon monoxide alarm is installed in any room containing a gas, liquid or solid fuel burning appliance.
- Check that an annual landlord gas safety has been undertaken by a Gas Safe registered engineer (a copy of the certificate must be provided to the guardianship organisation.)



- The guardianship organisation will check that the homestay has ensured 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.
- The guardianship organisation must check that the homestay discusses the possible evacuation routes from the property with students on a regular basis. If doors or windows are locked students must know where to find the key in the event of a fire.
- If fire extinguishers and fire blankets are provided the guardianship organisation will check that these have been suitably serviced.
- Where open fires are used, a check will be made that suitable fire guards are in place when the fire is lit.
- The guardianship organisation will check that any matches / lighters should be appropriately stored.
- The guardianship organisation will check that a basic first aid kit is available. This should include, plasters, sterile eye-pad, triangular bandage, safety pins, non-medicated wound dressing, disposable gloves, leaflet giving guidance on first aid.
- The guardianship organisation will check that any prescription medication and drugs should be kept safely especially when hosting young students.
- The guardianship organisation will check that alcohol should be appropriately stored.
- The homestay should have an awareness of basic food hygiene when preparing meals for students.
- Advisory: We advise 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.

The guardianship organisation will conduct at least an annual visit in person to each homestay held on their records. During this visit, support will be offered to the homestay and suitable checks for safety and suitability will be undertaken to ensure any changes since the last visit are properly recorded and felt to be acceptable. The smoke alarms and carbon monoxide alarms should also be tested. Comprehensive notes of this visit must be recorded within the homestay file.

Any issues in relation to the welfare health and safety of students should be reported immediately to: **the DSL Kasha Hancock** via email: [k.handcock@iqconsultancy.uk](mailto:k.handcock@iqconsultancy.uk) or telephone +44 (0)7824 44 95 40. A full investigation will take place, and action taken where necessary. A full record of the concern and action taken as a result will be maintained in the **IQ Consultancy LTD** Health and Safety file.

## Private Fostering Compliance Policy

### Policy statement

**IQ Consultancy LTD** recognises moral and statutory responsibility to safeguard and promote the welfare of all children and places the highest priority on ensuring the health and safety of the students in their care.

The purpose of this policy is to provide staff with the information they need in order to secure positive outcomes for privately fostered children and reduce the risks to their welfare and safety.

This policy is based on guidance from the National Minimum Standards for Private Fostering and the Children Act 1989 and ensures that **IQ Consultancy LTD** adheres to their principles.

Full details can be found on [the website](#).

The member of staff responsible for any welfare, health and safety issues is **Kasha Handcock** – phone: **+44 (0) 782444 9540**.

### Aims and objectives

The aims and objectives of this document are to:

- Make sure that staff and volunteers are aware of their duties and functions in relation to private fostering.
- Safeguard and promote the welfare of children privately fostered by **IQ Consultancy LTD**.
- Clarify what advice and support private foster carers and parents of privately fostered children may receive.
- Clarify what advice and support children privately fostered should/may access so that their welfare is safeguarded and promoted.

### Definitions

**A privately fostered child** is defined in the Children Act 1989 as a child under the age of 16 (or under 18 if the child has disabilities) who is cared for and provided with accommodation for 28 days or more by someone who is not the child's parent, or close relative, or someone with parental responsibility. It is a private arrangement between parent and IQ Consultancy LTD.

**Language Schools and Host Families** – children attending Language Schools may meet the criteria for private fostering. Such children are usually boarded with 'host' families. If the arrangement meets the criteria for private fostering, it will be considered to be private fostering.

**Holiday schemes** — where 'holiday' schemes are organised and children are boarded with host families the arrangement will be treated as private fostering if the length of stay with the host family or the age of the child meets the criteria for private fostering.

**Guardianship Organisations** — Guardianship organisations provide "guardians" with whom children who are at boarding school can live when the school closes during the holidays and the child is unable to return to live with his/her parents.

This usually applies to children whose parents are abroad and, for whatever reason, cannot have the child back with them. Where such arrangements are intended to last for more than 28 consecutive days then they should be treated as a private fostering arrangement.

## Principles

**IQ Consultancy LTD** works to the following principles:

- Child focused — the child's welfare, safety and needs are at the centre of the process at all times. The child's wishes and feelings will be given full consideration.
- Partnership — all staff, volunteers and homestays will work in partnership with children, parents, and other organisations to ensure that the most appropriate services are provided to meet assessed needs.
- Anti-discriminatory practice — all services provided will be free from discrimination, prejudice or racism.

## Local authority role in safeguarding and promoting welfare

**IQ Consultancy LTD** must notify the appropriate Local Authority at least six weeks before the arrangement is to begin. Where the arrangement is to begin within six weeks, the local authority is to be informed immediately.

In order to understand the child and to care for him or her **IQ Consultancy LTD** has to require information about the child and this information should be passed on to the Local Authority when giving notification. This information should include:

- the child's history which can include the child's name, sex, date and place of birth;
- information regarding the child's health;
- eating preferences;
- education;
- religious, cultural or ethnic background;
- hobbies.

**IQ Consultancy LTD** should give them the Local Authority information including what has been outlined above and should also include:

- the name and current address of the person giving notice;
- the date on which the intended private fostering arrangement will start or when it started;
- any conviction, disqualification or prohibition imposed on the private foster carer or any other person living or employed at his/her household;
- any court orders relating to the child.

**IQ Consultancy LTD** must also notify the appropriate Local Authority of any change of their circumstances regarding the above. The Local Authority should also be notified if the child has a new private foster carer.

**IQ Consultancy LTD** must record all correspondence with the local authority private fostering team and secure relevant permissions to share such information as is necessary with the student, parents, agents (where appropriate), homestay and partner school.

Full details can be found on [the website](#).

## Bullying including Cyberbullying and E-Safety Policy

### Policy Statement

#### The purpose of this policy is:

- to help prevent bullying (including cyber-bullying) from happening to students in our care;
- to make sure bullying is stopped as soon as possible if it does happen and that those involved receive the support they need;
- to provide information to all staff, volunteers, students and their parents about what we should all do to prevent and deal with bullying;
- to ensure the safety of our students who use the internet and related communication technologies.

#### **IQ Consultancy LTD** believes that:

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

#### **IQ Consultancy LTD** recognises that:

- bullying causes real distress. It can affect a person's health and development

and, at the extreme, can cause significant harm;

- all children, regardless of age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, have the right to equal protection from all types of harm or abuse;
- the potential impact of bullying on the wider family of those affected so will work in partnership with parents/carers regarding all reported bullying concerns and will seek to keep them informed at all stages;
- everyone has a role to play in preventing all forms of bullying (including online) and putting a stop to it.

**IQ Consultancy LTD** undertakes:

- to monitor and review our anti-bullying policy and practice on a regular basis;
- to support staff to promote positive relationships to help prevent bullying;
- to ensure students in our care are aware that bullying concerns will be dealt with sensitively and effectively; that everyone should feel safe to learn and abide by the anti-bullying policy;
- to utilise support from the Local Authority and other relevant organisations when appropriate.

## Contact Details

### Designated lead for safeguarding and child protection



**Kasha Handcock**

Phone: +44 (0) 782 444 9540

Email: [k.handcock@iqconsultancy.uk](mailto:k.handcock@iqconsultancy.uk)

**NSPCC Helpline:** 0808 800 5000

**Bullying** is repeated over time behaviour that hurts a student or group physically or emotionally and is often motivated by prejudice against particular groups, for example, on grounds of race, religion, culture, sex, gender, homophobia, special educational needs and disability, or because a child is adopted or is a carer.

**Cyberbullying** is bullying that takes place using technology including social media sites, mobile phones, gaming sites. Unlike bullying in the real world, online bullying can follow the child wherever they go, via social networks, gaming and mobile phones.

## E-Safety. Areas of risk

An effective approach to online safety empowers a school, college, guardian or homestay to protect and educate children in their use of technology and establishes mechanisms to identify, intervene in and escalate any incident where appropriate.

The breadth of issues classified within e-safety is considerable, but can be categorised into three areas of risk:

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

**Online abuse** is a type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones and can include: grooming (building an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking), sexual abuse, 'sexting' or youth produced imagery, sexual exploitation, county lines gang recruitment, radicalisation or emotional abuse from people they know as well as from strangers.

**IQ Consultancy LTD** recognises that Bullying and Cyberbullying can take different forms and no single sign will indicate for certain that a child is being bullied, to do our best to indicate any forms of bullying, and protect from it students in our care we follow [recommendations given by NSPCC](#).

**Homestays** play a crucial role in ensuring that the students who stay with them use the internet and mobile devices in accordance with the guidance contained within the Homestay Manual. Hosts International will take every opportunity to help homestays understand the issues by providing them regular safeguarding updates and training to an appropriate basic awareness level.

**Students** are responsible for using the internet and mobile devices in accordance with the guidance in the Student Handbook. **Kasha Handcock** further supports students in raising their awareness of how to stay safe online through our social media updates, policies and website.

To supervise internet access and set boundaries about what staff, students and homestays can and cannot do online we encourage them to set an appropriate agreement with students according to which we would ask the homestay through Hosts International Ltd to restrict internet access for an agreed period of time if a child doesn't comply with the rules.

Below is some suggested advice for talking to children about online safety:

[NSPCC](#)  
[Childnet](#)

The NSPCC encourage talking to children about online privacy and being '[Share Aware](#)'.

## Procedures

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

- Students will be made aware that they can talk to their parents, teachers, homestay, or a member of **IQ Consultancy** staff about any bullying concerns they may have.
- **IQ Consultancy** staff member may receive a report of any suspected abuse from a student, parent or other source by face to face disclosure, email or telephone call. This disclosure will be recorded in writing by the member of staff (using the 'Tell Explain Describe' model if the information is being given by a student);
- Any concerns raised by a student, parent, homestay, member of staff or other source will be reported within 24 hours to **Kasha Handcock**. The written record (see above) must be submitted at this time.
- The DSL will hold an emergency strategy meeting to discuss the incident, assess the alleged threat and risk to the student (including any relevant facts about the child which may affect their vulnerability including age and ability), implement an action plan and continue to review the situation until a resolution has been achieved. Written notes will be kept securely of this meeting by the DSL.
- The DSL will arrange for the young person to be helped and supported in recognition of the pressures (and possible vulnerabilities) they may have been under as a result of the suspected abuse.
- Any concerns that bullying (including cyber-bullying) has taken place at a student's school will be referred to the DSL of the school concerned.
- If the alleged bullying incident involves a member of the homestay family, or another student staying at the homestay, **IQ Consultancy LTD** will investigate fully as outlined above and if necessary find alternative accommodation for the student.
- Parents will be kept informed about the situation and the actions that the members of **IQ Consultancy** are taking unless there is good reason to believe that involving these parties would put the young person at risk of harm.
- We will support the victim and the perpetrator (if they are a student in our care) and



monitor students well-being following a bullying incident for as long as necessary.

- Where there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' due to bullying, we will refer the matter to local agencies.
- **Please note that strong sanctions such as termination of our contract may be necessary in cases of severe and persistent bullying.**
- Full records will be kept of any bullying concerns and of any actions taken. These will be held confidentially by **Kasha Handcock**.

### **Specific cyberbullying procedures in addition to the above**

- In the case of cyberbullying support for the student could include helping them to understand how to recognise the early signs of online abuse, the wider issues and motivations of online abuse and making available relevant information and material. This help and support could be provided by accredited organisations such as the school, National Society for the Prevention of Cruelty to Children (NSPCC), ChildLine and National Crime Agency (NCA) – Child Exploitation and Online Protection Centre (CEOP) websites and helplines.
- The DSL will ensure that viewing of the images or other content is only made where there are good and clear reasons to do so (unless unavoidable because the student has willingly shown a member of staff), basing incident decisions on what the DSL has been told about the content of the imagery or other content. The DSL will ensure that staff members do not search through devices and delete imagery unless there is a good and clear reason to do so.
- The DSL will consider the need to ask for the student to produce the device as evidence. The viewing of any images, other content or seizing of any devices will be recorded including those present, date and time.
- The incident will be referred to a statutory agency (Children's Services on the Local Authority telephone number or the police by dialling 101) **immediately** if there is a concern a young person has been harmed or is at immediate risk of harm (telephone the police by dialling 999). **This would include information coming to light if at the initial stage:**
  - The incident involves an adult.
  - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
  - What you know about the imagery or other content suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
  - The imagery or other content involves sexual acts and any pupil in the imagery is under 13.
  - You have reason to believe a student is at immediate risk of harm owing to the



sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

- Where the material or activities found or suspected are illegal and there is no immediate risk to the child, The Child and Exploitation Online Paedophile Unit should be informed.
- If none of the above apply, the DSL may decide to respond to the incident without involving the police or children's social care. The DSL can choose to escalate the incident at any time if further information/concerns come to light. The decision should be recorded in line with the Safeguarding Policy and Child Protection Policy, and regularly reviewed throughout the process of responding to the incident.
- The decision to respond to the incident without involving the police or children's social care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved, and the risks can be managed within **IQ Consultancy LTD** support framework and network for the child.
- The DSL will advise the young person to delete imagery or other content, and to confirm they have deleted the imagery. Young people should be given a deadline for deletion across all devices, online storage or social media sites on the basis that possession of youth produced sexual imagery is illegal. Where a young person refuses or is later discovered to have not deleted the images or other content, they are committing a criminal offence and the police may become involved. A record will be made of these decisions as per the Safeguarding Policy including decisions, times, dates and reasons. **IQ Consultancy LTD** may wish to invoke their own measures to discourage young people sharing, creating or receiving images in line with behaviour policies.
- Where the DSL is aware that youth produced sexual imagery or other content has been unavoidably viewed by a member of staff, the DSL should ensure that the staff member has appropriate support. Viewing youth produced sexual imagery or other content can be distressing for both young people and adults and appropriate emotional support may be required.
- **Where police action has been instigated for an incident involving a member of staff or volunteer, IQ Consultancy LTD internal procedures will take place at the conclusion of the police action. A suspension will be likely to take place before the internal procedures begin.**

## Related policies and procedures

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

- Safeguarding and Child Protection Policy;

- Staff Code of Conduct;
- Student Behaviour Code of Conduct.

## Anti-Radicalisation Policy

### Policy Statement

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

### Legislation

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

#### **Contest is split into four strands:**

**Prevent** – to stop people becoming terrorists or supporting terrorism.

**Protect** – to strengthen our protection against terrorist attacks.

**Pursue** – to stop terrorist attacks.

**Prepare** – when an attack cannot be stopped to mitigate its impact.

From July 2015 schools and colleges are subject to section 26 of the Counter-Terrorism and Security Act 2015, which states that in the exercise of their functions they are to have “due regard to the need to prevent people from being drawn into terrorism” i.e. the unofficial or unauthorised use of violence and intimidation in the pursuit of political aims. This duty is known as the Prevent Duty and applies to a wide range of public-facing bodies.

The Prevent strategy was revised in 2011 and has the three following objectives:

1. Challenging terrorist ideology by working closely with other local and national agencies and partners, including our communities.
2. Supporting vulnerable individuals through intervention projects.
3. Work closely with institutions where risks may occur such as education, prisons and health.

This duty is passed onto schools in the statutory guidance ***Keeping Children Safe in Education***

**(2024)** which states that protecting children from the risk of radicalisation (i.e. the process where someone is lead to adopt extreme political, social and religious ideals and aspirations), should be seen as part of schools’ and colleges’ wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse:

“Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised.”

**IQ Consultancy LTD** staff should be alert to changes in reports of changes in children’s behaviour which could indicate that they may need help or protection. Staff are encouraged to use their judgement in identifying children who may be at risk of radicalisation and to report any concerns to the Prevent Lead **Kasha Handcock**. This may result in the Prevent Lead making a referral to the Channel programme.

## Policy

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

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

### Prevent Lead Contact Details

Role	Name	Contacts
Prevent Lead	Kasha Handcock	Phone: +44 (0)7824 44 95 40 Email: <a href="mailto:k.handcock@iqconsultancy.uk">k.handcock@iqconsultancy.uk</a>

24-Hour emergency contact	Ksenia Soldatikhina	Phone: +44 (0)7522 84 80 26 Email: <a href="mailto:k.soldatikhina@iqconsultancy.uk">k.soldatikhina@iqconsultancy.uk</a>
---------------------------------	------------------------	--

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

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

### Recognising risks and vulnerabilities of radicalisation

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

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

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

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

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

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

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

### Potential risk indicators include:

- use of inappropriate language;

- possession of violent extremist literature or accessing extremist websites;
- behavioural changes;
- the expression of extremist views;
- advocating violent actions and means;
- association with known extremists;
- articulating support for violent extremist causes or leaders;
- using extremist views to explain personal disadvantage;
- joining or seeking to join extremist organisations;
- seeking to recruit others to an extremist ideology.

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

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

## Working with partners to protect children

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

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

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

## Awareness Training for Staff

The following sites provide online training for staff who can regularly self-brief on how to identify children and young people who are at risk of radicalisation and extremism. Staff are expected to use these tools annually to complement the safeguarding training provided by **IQ Consultancy LTD** provided by the company.

[Online Course](#)

## Procedure for reporting concerns

1. **IQ Consultancy LTD** staff member receives a report about a child or young person displaying indicators of radicalisation from a student, member of staff at a school, parent or other source by face to face disclosure, email or telephone call, or staff member develops concerns that a child or young person is displaying possible indicators of radicalisation.
2. **IQ Consultancy LTD** staff member adheres to the Safeguarding and Child Protection Policy including contemporaneously recording the disclosure in the most appropriate format (using the Tell Explain Describe model if the information is being given by a student), or reporting their concerns in writing to the Prevent Lead, **Kasha Handcock** Phone: **+44 (0) 782 444 9540**.
3. The record of the disclosure is reported verbally as soon as practicable to the Prevent Lead, **Kasha Handcock** Phone: **+44 (0) 782 444 9540**.
4. The staff member must submit a written record of the disclosure or concern to the DSL **Kasha Handcock** Phone: **+44 (0) 782 444 9540**.
5. The Prevent Lead will hold an emergency strategy meeting to discuss the incident, assess the alleged threat and risk to the child, implement an action plan and continue to review the situation until a resolution has been achieved. The meeting will be recorded with timed and dated entries within an incident Record to record all actions and updates.
6. The incident will be referred to a statutory agency for further review where this is a necessary, relevant and proportionate course of action where a child or young person may be at risk of suffering significant harm or in need of support.

## Missing Student Procedure

### Statement

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

**IQ Consultancy LTD** is committed to safeguarding and promoting the welfare of children and young people.

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

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

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

**24-hour contact number** for students, staff, volunteers, homestays and schools to report any missing students to IQ Consultancy LTD **+44(0)7522 848026**.

## Definitions

**IQ Consultancy LTD** adoption of distinct definitions to determine whether someone is missing or absent is in accordance with the National Police Chiefs Council definitions (issued by ACPO in 2013). The following definitions are included within the Local Safeguarding Children Board protocols:

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

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

## Supporting Reference Documents

- NPCC publications;
- Working Together to Safeguard Children 2023;
- Child sexual exploitation 2017;
- Scoping Report on Missing and Abducted Children – CEOP;
- Local Safeguarding Children Board Protocols – Reporting children who go missing from care ;
- Statutory Guidance on children who run away or go missing from home or care – Department of Education 2014;
- [Children Missing Education](#).

## Procedure

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

**The DSL Kasha Handcock**, shall manage any cases of absent or missing children or young people, and as such all reports must be brought to the attention of the DSL.



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

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

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

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

The incident lead is responsible for ensuring the school is informed of any report made to the police of an absent or missing child or young person, as the school retains the overall duty of care. The school should be updated with any developments as they should know the whereabouts of the student at all times, especially those on visas.

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

All missing person reports are to be reviewed by **the DSL Kasha Handcock** as soon as practicable with subsequent on-going daily review until the incident is resolved.

## Process and Response – report of a missing child

1. A child or young person who falls into the 'Missing' Category must be reported to the police as soon as possible by telephoning 101 for a non-emergency report or 999

for an emergency response i.e. information received that a child or young person is in immediate danger of harm.

You will need to ensure that you are transferred to the force relevant to the area the child is missing/absent from. If calling 999 you will need to tell the call handler to stay on the line, while you are transferred to the relevant force.

2. The DSL will ensure that the following information is gathered for the initial report to the police:
  - a. name, date of birth and nationality of the child or young person;
  - b. the specific concern for the child or young person;
  - c. whether they are likely to be subjected to crime, victim of abuse or at risk of sexual exploitation;
  - d. whether the child or young person likely to attempt suicide;
  - e. whether the child or young person likely to pose a danger to other people;
  - f. what actions have been completed so far to locate the child or young person;
  - g. a description of the child or young person, including their build, hair, clothing and glasses;
  - h. details of when the child or young person was last seen and with whom;
  - i. personal details of the child or young person (including any medical conditions or ailments);
  - j. any previous history of absconding/absenteeism and circumstances of where found;
  - k. the circumstances under which the child or young person is absent;
  - l. any factors which increase the risk to the child or young person;
  - m. homestay address.

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

- a recent photograph (if available);
- family addresses and contact telephone numbers;
- known associates, telephone numbers and addresses frequented;
- the names and addresses of the child or young person's GP and dentist;
- the circumstances under which the child or young person is absent;

- any factors which increase the risk to the child or young person;
  - school and Houseparent addresses and contact details;
  - details of any travel and accommodation plans authorised by the overseas parents;
  - details of any social media accounts that may be open to the public.
3. The incident must be recorded as an incident report file with regular updates being added until the matter has been resolved. If a police report has been made, the police incident reference number must be recorded. A record of all emails should be included in the incident report file.
  4. Following the report to the police, the parents, school and homestay(if applicable) must be informed and requested to contact **the DSL Kasha Handcock** without delay if the child or young person makes contact.

## Process and Response – report of an absent child

1. If a child or young person is considered to fall within the definition of absent, the decision to record the child as such, together with the evidence supporting that decision must be recorded. The absence of a child or young person must be recorded in the Student File as an ‘incident’.
2. Details of children or young people who are absent should still be notified to the police (using the non-emergency telephone number 101 or the emergency telephone number 999) in order that a record of the child or young person’s absence can be made, an agreement can be reached on what needs to be done, review times and on-going actions. Although there is an expectation that **IQ Consultancy LTD** should continue to make reasonable enquiries to locate the child or young person, the police may also initiate some enquiries as appropriate.
3. **The DSL Kasha Handcock** will notify the school and parents/agent of the incident, and regularly provide updates to both parties (minimum every 4 hours) with news of any developments, or confirmation that there have been no developments since the last update. This also affords an opportunity for the school or parents to update **the DSL** with any contact they may have had from the student or other information received. All updates provided to the school and parents must be recorded in the incident record.
4. **IQ Consultancy LTD** staff will constantly review the circumstances in the light of any enquiries made or information received, and inform the police of any developments by telephoning 101, quoting the reference number and providing the new information received. If the period of absence continues for **six hours**, consideration should be given as to whether the child should still be regarded as absent, or whether they should now be considered as missing. Six hours should be regarded as the maximum period before

reconsideration, and in many cases a shorter period would be more appropriate.

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

## Informing the media

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

## The Return

1. The police are responsible for ensuring that the child or young person reported missing has returned safe and well, and has an opportunity to disclose any relevant issues in the return interview.
2. Where a child or young person has been reported as absent to the police they will not be given a return interview. In such cases, an **IQ Consultancy LTD** member of staff will conduct the return interview to allow the child or young person an opportunity to talk to someone about their absence.
3. Where an allegation of any form of child abuse is made or becomes evident, child protection procedures must be implemented and immediate contact must be made with the police child protection team and the Local Authority Child Protection Service where the child is living.
4. If there is any suggestion that the child has been a victim or perpetrator of crime, consideration must be given to securing evidence by police including by forensic examination. This should also include securing clothing and delaying washing/bathing in relevant cases. Staff must remember that all necessary permissions must be obtained from the child or young person's parents and/or those with parental responsibility. The priority is to recognise that the welfare of the child or young person is paramount and careful consideration must be given to the potential effects of such procedures on the child or young person.
5. Any persons informed of the child or young person's absence should be advised of the child or young person's return without delay including the school and parent.
6. For a child or young person who has been reported as absent or missing on two or more occasions, **IQ Consultancy LTD** will decide in consultation with others, whether a formal review of the guardianship is required.

## Children Missing Education

Children Missing Education (2024) is statutory guidance that sets out key principles to enable local authorities in England to implement their legal duty under section 436A of the Education Act 1996 to make arrangements to identify, as far as it is possible to do so, children missing education (CME).

Children Missing Education explains that:

"All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Local authorities should focus their resources effectively in intervening early in the lives of vulnerable children to help prevent poor outcomes."

Should **IQ Consultancy LTD** become aware that a student in their care is missing from education, they will notify the school or college that the student attends immediately.

## Emergency Procedure

### Statement

The safety of our students is our main priority. **IQ Consultancy LTD** acknowledges that there may be situations out of their control that require planning for. This plan outlines what **IQ Consultancy LTD** will do in the event of an emergency.

(Please note that the scenarios are not exhaustive).

### Emergency Procedure

#### Dealing with an emergency

It is important that staff who receive an emergency call keep calm and remember to note all of the information provided. You may need to provide reassurance and support to the informant as they may be upset, suffering from shock or may panic.

- Ascertain out what has happened, gathering as much information as you can.

- Discuss with the informant what action needs to be taken and by whom.
- Keep a written record of the information and of any actions taken. (A template for recording incidents is included at the end of this plan).
- The Director Kasha Handcock should be informed immediately about the situation.

## Specific scenarios

Please note that specific scenarios may require a bespoke plan that will include further details on how we will handle the issue. Where this is the case **IQ Consultancy LTD** will circulate the plan with all relevant parties.

### Cancelled Flights

When a student's flight is cancelled in the UK **IQ Consultancy LTD** will arrange for suitable care. If necessary students will be accommodated in an emergency homestay until it is possible to travel. Where a student is waiting at an airport without a member of our staff, students are required to contact **IQ Consultancy LTD** as soon as they are aware that their flights have been cancelled. Parents will be kept fully informed of the situation. **IQ Consultancy LTD** will liaise with the airline and parents to rearrange the flights.

### Pandemic / Contagious Outbreak

Pandemics can cause major disruption to travel and schooling. It is important in such events to take advice from the government, Public Health England and the World Health Organisation. AEGIS provides guidance for members to follow. This is regularly updated as a situation develops.

Usually, in a pandemic it is important to restrict movement so as not to spread the disease further. That means boarding school students would usually remain at school. In the event of a pandemic **IQ Consultancy LTD** may not be able to offer homestay accommodation as this could place students, homestay families and the wider community at risk.

**IQ Consultancy LTD** will work with parents and schools to find suitable quarantine accommodation for students where required.

**IQ Consultancy LTD** will work with schools to meet students' needs during a pandemic. This could be by helping to support students to learn remotely as directed by the school.

**IQ Consultancy LTD** will work with parents to find flights to home countries where required.

### Serious injury or death of a student

Serious injury or death of a student is distressing for all concerned. **IQ Consultancy LTD** will:

- Liaise with medical staff, police, and a relevant embassy.

- Keep parents informed.
- Help parents arrange flights.
- Handle any media enquiries.
- Liaise with schools and any other external agencies (such as LSP) where required.
- If required, assist parents with rehabilitation and flights home.
- If required, assist parents with funeral arrangements.

## Terrorist incident

Schools will have their own lockdown procedures to ensure the safety of students in the event of a terror attack. In the event of a terror attack taking place in the UK when a student is staying at a homestay, **IQ Consultancy LTD** will follow the guidance provided by the UK government and the police. Unless instructed otherwise, students will be asked to remain in the homestay and not to go out unaccompanied by their homestay. In such a situation **IQ Consultancy LTD** will assess the risks and act accordingly.

## Fire

In the event of a fire at a homestay, after dealing with the emergency by calling the fire brigade, the homestay is expected to inform **IQ Consultancy LTD**. Students will be moved to a different homestay until the accommodation is refurbished and the suitability of accommodation is checked.

## School closures

There are many reasons why a school may close. These could be temporary, such as due to weather or a staff shortage or permanent, for example due to bankruptcy. Unless closure is due to a contagious disease (see pandemic guidance above), **IQ Consultancy LTD** will provide accommodation for students with their homestays\*.

## Student cannot be accommodated by the school

If a student cannot be accommodated by the school due to illness, disciplinary action or any other cause **IQ Consultancy LTD** will liaise with the school staff including medical staff where applicable. **IQ Consultancy LTD** will provide accommodation for students with homestays\*.

---

### *\*Emergency Homestay Accommodation*

Please note that emergency homestay placements may not necessarily be with the students' usual homestay, but will be with one of homestays who provide high levels of care. These homestays may be a greater distance from the school. Wherever possible we will place students with their usual homestay.

## Emergency Contact Details

### Guardian Organisation staff

Organisation	Contact details
IQ Consultancy LTD	<p>Kasha Handcock</p> <p>Phone: +44 (0)7824 44 95 40</p> <p>Email: <a href="mailto:k.handcock@iqconsultancy.uk">k.handcock@iqconsultancy.uk</a></p>

### Other organisations

Organisation	Contact details
Police	<p>Tel: 999 (24-hour)</p> <p>Tel: 101 (24-hour, non-emergency number)</p>
Fire & Rescue service	Tel: 999 (24-hour)
Ambulance service	Tel: 999 (24-hour)
National Health Service	Tel: 111 (24-hour)
AEGIS	Tel: 01453 821 293
Foreign, Commonwealth & Development Office	Tel: 0207 008 1500 (24-hour, consular assistance)
Environment Agency	Tel: 0345 988 1188 (24-hour Floodline)
Met Office	Tel: 0370 900 0100 (24-hour, weather desk)



Health and Safety Executive	<p>Incident Contact Centre: 0345 300 9923 (Monday to Friday 8.30 am until 5pm)</p> <p>Out of hours duty officer (24-hour): 0151 922 9235 <a href="http://www.hse.gov.uk">www.hse.gov.uk</a></p>
Public Health England	<p>Main Switchboard: 020 7654 8000 Email: <a href="mailto:enquiries@phe.gov.uk">enquiries@phe.gov.uk</a></p> <p><a href="http://www.gov.uk/government/organisations/public-health-england">www.gov.uk/government/organisations/public-health-england</a></p>
World Health Organisation	<a href="https://www.who.int/">https://www.who.int/</a>

## Whistleblowing Policy and low-level concerns

### Policy Statement

**IQ Consultancy LTD** is committed to the highest standards of transparency, integrity and accountability in its inspection and accreditation work and the sharing of best practice in guardianship of international students. Concerns about poor practice within **IQ Consultancy LTD** should usually be dealt with through the **IQ Consultancy LTD** complaints procedure. However serious allegations may be raised by following the whistleblowing policy. It is the duty of all staff members of **IQ Consultancy LTD** and those associated with **IQ Consultancy LTD**, to raise any concerns so that improvements can be made. Raising concerns will not result in reprisals in any form. This policy is intended to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action in a way that will ensure confidentiality and protect those making such allegations in the reasonable belief that it is in the public interest to do so from being victimised, discriminated against or disadvantaged. This policy does not replace other policies and procedures such as the IQ Consultancy LTD Complaints Procedure. This procedure applies to all **IQ Consultancy LTD** employees and also includes associates, contractors, and schools. If an employee has a concern about the conduct of a fellow employee in the working environment (e.g. that they are not treating colleagues with respect) they should raise this with **the Director Kasha Handcock**.

### Policy

This procedure applies to, but is not limited to, allegations about any of the following:

- conduct which is an offence or breach of the law;
- alleged miscarriage of justice;
- serious health and safety risks;
- the unauthorised use of public funds;
- possible fraud and corruption;
- sexual, physical or verbal abuse, or bullying or intimidation of employees, customers or service users;
- abuse of authority;
- other unethical conduct.

## Reporting

**IQ Consultancy LTD** recognises that the decision to make an allegation can be a difficult one to make. However, whistleblowers who make serious allegations in the reasonable belief that it is in the public interest to do so have nothing to fear because they are doing their duty to those for whom a service is provided.

**IQ Consultancy LTD** will take appropriate action to protect a whistleblower who makes a serious allegation in the reasonable belief that it is in the public interest to do so from any reprisals, harassment or victimisation.

## Confidentiality

All allegations will be treated in confidence and every effort will be made not to reveal a whistleblower's identity unless requested by the whistleblower. **IQ Consultancy LTD** will not, without the whistleblower's consent, disclose the identity of a whistleblower to anyone other than a person involved in the investigation/allegation. Sometimes the whistleblower might be asked to give a statement as part of the investigation, in which case their identity may have to be revealed.

## Anonymous allegations

This policy encourages whistleblowers to put their name to an allegation wherever possible as anonymous allegations may often be difficult to substantiate/prove. Allegations made anonymously are much less powerful but anonymous allegations will be considered at the discretion of **the Director Kasha Handcock**. In exercising discretion to accept an anonymous allegation the factors to be taken into account:

- the seriousness of the issue raised;
- the credibility of the allegation;

- and whether the allegation can realistically be investigated from factors or sources other than the complainant.

## Untrue allegations

No disciplinary or other action will be taken against a whistleblower who makes an allegation in the reasonable belief that it is in the public interest to do so even if the allegation is not substantiated by an investigation. However, disciplinary action may be taken against a whistleblower who makes an allegation without reasonable belief that it is in the public interest to do so (e.g. making an allegation frivolously, maliciously or for personal gain where there is no element of public interest).

## Procedure for making an allegation

It is preferable for allegations to be made to, for example, an employee's immediate manager to whom they report. However, this may depend on the seriousness and sensitivity of the issues involved and who is suspected of the malpractice. For example, if the whistleblower believes that management is involved it would be inappropriate to raise it directly with them. The whistleblower may then make an allegation direct to any of the following:

The NSPCC whistleblowing helpline is **0800 028 0285** between 8am and 8pm Monday to Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Protect provides a free, confidential advice line for concerned staff to call before whistleblowing. The helpline is **020 3117 2520** and their website is: <https://protect-advice.org.uk/>

AEGIS Telephone number: **01453 821 293** or email [yasemin@aegisuk.net](mailto:yasemin@aegisuk.net).

## Allegation

Whether a written or oral report is made it is important that relevant information is provided including:

- the name of the person making the allegation and a contact point;
- the background and history of the allegation (giving relevant dates and names and positions of those who may be in a position to have contributed to the allegation);
- the specific reason for the allegation.

Although someone making an allegation will not be expected to prove the truth of any allegations, they will need to provide information to the person they have reported to, to establish that there are reasonable grounds for the allegation.

## Action on receipt of an allegation

The line manager will record details of the allegation gathering as much information as possible, (within 5 working days of receipt of the allegation) including:

- the record of the allegation;
- the acknowledgement of the allegation;
- any documents supplied by the whistleblower.

The investigator will ask the whistleblower for their preferred means of communication and contact details and use these for all communications with the whistleblower in order to preserve confidentiality.

If the allegation relates to fraud, potential fraud or other financial irregularity **the Director Kasha Handcock** will be informed within 5 working days of receipt of the allegation. **The Director Kasha Handcock** will determine whether the allegation should be investigated and the method of investigation.

If the allegation discloses evidence of a criminal offence it will immediately be reported to **the Director Kasha Handcock** and a decision will be made as to whether to inform the Police or appropriate authorities.

## Timetable

An acknowledgement of the allegation in writing within 10 working days with:

- an indication of how **IQ Consultancy LTD** propose to deal with the matter;
- an estimate of how long it will take to provide a final response;
- an indication of whether any initial enquiries have been made;
- information on whistleblower support mechanisms;
- indication whether further investigations will take place and if not, why not.

Where the allegation has been made internally and anonymously, obviously **IQ Consultancy LTD** will be unable to communicate what action has been taken.

## Support

**IQ Consultancy LTD** will take steps to minimise any difficulties which may be experienced as a result of making an allegation. For instance, if a whistleblower is required to give evidence in criminal or disciplinary proceedings **IQ Consultancy LTD** will arrange for them to receive advice

about the procedure and advise on the support mechanisms that are available.

**IQ Consultancy LTD** accepts that whistleblowers need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, we will inform those making allegations of the outcome of any investigation.

## Responsibility for the procedure

**The Director Kasha Handcock** has overall responsibility for the operation of this procedure and for determining the administrative processes to be followed and the format of the records to be kept.

## Monitoring

A Register will record the following details:

- the name and status (e.g. employee) of the whistleblower;
- the date on which the allegation was received;
- the nature of the allegation;
- details of the person who received the allegation;
- whether the allegation is to be investigated and, if yes, by whom;
- the outcome of the investigation;
- any other relevant details.

The Register will be confidential and only available for inspection by the director. Further information and advice can be found [here](#).

## 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. **IQ Consultancy LTD** recognises the importance of dealing with low-level concerns efficiently and in good time. No concern about a child's safety should be left uninvestigated and unanswered. Therefore for dealing with low-level concerns **IQ Consultancy LTD** follows the same procedure as for whistleblowing as outlined above.

## Contact details

Role	Name	Contacts
The Director	Kasha Handcock	Phone: +44 (0)7824 44 95 40 Email: <a href="mailto:k.handcock@iqconsultancy.uk">k.handcock@iqconsultancy.uk</a>

## Complaints Policy

### Policy Statement

**IQ Consultancy LTD** recognises that there may be legitimate concerns or complaints from students, staff, schools or parents relating to **IQ Consultancy LTD**. As a company we encourage these concerns or complaints being made known to **IQ Consultancy LTD** staff so that they can be addressed in partnership with us, and we can continuously improve our service.

At **IQ Consultancy LTD** we:

- Take all concerns and complaints seriously.
- Make every effort to deal with concerns or complaints informally and at an early stage.
- Resolve all complaints within 28 working days of the complaint being received.
- Ensure that complaints are dealt with in line with the procedures set out in this document.
- Ensure that complaints are resolved either to the complainant's satisfaction or with an otherwise appropriate outcome which balances the rights and duties of students.
- Ensure that, where appropriate, a full and fair investigation of the issue is undertaken.
- Ensure that no-one, including students, are penalised for making a complaint in good faith.
- Keep a written record, for at least three years, of all complaints, the action taken and at what stage they were resolved.
- Review regularly at senior management level the written record of complaints and their outcomes.
- Keep confidential all records relating to individual complaints.
- A record of formal complaints and their outcomes is kept by **The Director Kasha Handcock** either in an electronic copy or in a hard copy regardless of whether they were upheld.

## Complaints Procedure

### Stage 1: Informal Stage

It is hoped that most concerns or complaints can be resolved informally. A concern or complaint can be made in person, in writing/by email or by telephone. They may also be made by a third party acting on behalf of a complainant, as long as they have appropriate consent to do so. Concerns should be raised with the relevant **IQ Consultancy LTD** staff member who will:

- Keep a record of the complaint and any action taken.
- Respond to all complaints or concerns within 24 hours.
- Investigate the concern or complaint.
- Report back to the complainant within 28 working days.

If the issue remains unresolved, the next step is to make a formal complaint.

### Stage 2: Formal Stage

If the complainant is not satisfied with how the complaint has been handled, they can make a formal complaint. This should be sent in writing/by email to **Kasha Handcock**. She will:

- Keep a record of the complaint and any action taken.
- Respond initially to the complainant within 24 hours.
- Investigate the concern or complaint – this may take some time but in any event they will keep the complainant informed of progress made.
- Report back to the complainant formally in writing no later than 28 working days.
- If the issue remains unresolved, the next step is to refer the matter to AEGIS.

### Stage 3: Referral of the matter to AEGIS

If complainants are not satisfied with the outcome as decided by **IQ Consultancy LTD**, they can contact AEGIS to report their concerns if they wish to do so.

Relevant contact details are set out below:

#### **Yasemin Wigglesworth**

Chief Executive Officer

Association for the Education and Guardianship of International Students  
(AEGIS)

The Wheelhouse, Bond's Mill Estate, Bristol Road, Stonehouse, Gloucestershire, GL10 3RF

Phone: +44 (0) 1453 821293

Email: [yasemin@aegisuk.net](mailto:yasemin@aegisuk.net)

[www.aegisuk.net](http://www.aegisuk.net)

## IQ Consultancy LTD Contact details

Role	Name	Contacts
The Director	Kasha Handcock	Phone: +44 (0)7824 44 95 40 Email: <a href="mailto:k.handcock@iqconsultancy.uk">k.handcock@iqconsultancy.uk</a>

## Staff Code of Conduct

The following code of conduct for staff gives clear guidance on behaviour that **IQ Consultancy LTD** expects from all members of staff working within the organisation. These guidelines confirm and reinforce the professional responsibilities of all staff. They help adults establish safe practices and reduce the risk of false accusations or improper conduct.

### Code of Conduct

#### Power and positions of trust

In your role of a member of staff, you will have power over students and will hold a position of trust. It is imperative that these are not abused in any way. **IQ Consultancy LTD** staff should be aware of their own conduct and ensure that their professional practice is clear and unambiguous. Staff should ensure that they work in an open and transparent way, not showing favouritism and by treating students respectfully and fairly irrespective of culture, disability, gender, language, racial origin, religious belief and sexual orientation.

#### Duty of care to children and young people

All staff and volunteers have a duty of care to children and young people. As such they must adhere to the various policies, including the safeguarding and child protection policy that outline how we safeguard students in our care.



## Exercising professional judgement

**IQ Consultancy LTD** recognises that this guidance may not cover every eventuality. There may be times when staff use their professional judgement to deal with situations not outlined in this section. In such circumstances staff should always advise their senior colleagues of the justification for any action taken or proposed.

## Use of appropriate language

It is important to remember that whilst undertaking your role, you are representing **IQ Consultancy LTD**. We expect all staff to be polite and courteous whilst undertaking their duties. It is inappropriate to swear or use abusive language.

## Sexual contact with young people

Any (contact or non-contact activity) sexual behaviour (including grooming of a child so sexual abuse can take place), by a member of staff with or towards a student is unacceptable and could be a matter for criminal and/or disciplinary proceedings. Students are protected by the same laws as adults in relation to non-consensual sexual behaviour, and by additional legal provisions depending on their age and understanding.

## Communication with Students

Communication with students should only be in a professional capacity, using appropriate language and tone.

## Social contact with Students

Staff members should not give their personal contact details to students for example email address, home telephone numbers or details of web based identities. If students locate these by any other means and attempt to contact or correspond with the staff member, they (staff member) should not respond and must report the matter to their line manager. Students and staff should communicate for professional reasons using the company email addresses and telephone numbers. It is inappropriate for staff to befriend students and mix with them socially as a friend.

## Social contact with Parents / Agents / staff at partner schools

As for students, it is inappropriate for guardianship organisation staff to befriend parents, agents or school staff on social media (unless they were previously friends). **IQ Consultancy LTD** expects any contact that staff have with parents, agents and staff at partner schools to be courteous and polite as the individual is representing the organisation. It is inappropriate for staff to befriend parents, agents or staff at partner schools and mix with them socially as a friend unless of course they were previously friends before working with them.

## Physical contact including restraint

Guardianship organisation staff family members are advised to avoid physical contact with students as even when well intentioned, this contact may be misconstrued by the student, an observer or any person to whom this action is described. There may also be cultural, gender sensitive or religious reasons about touching. Guardianship organisation staff must be aware that any physical contact with a student may need to be explained and would be open to scrutiny. Physical restraint should only be used if the student is placing themselves or others at risk. Any restraint must be reported immediately to **IQ Consultancy LTD**. A written record must be submitted. Parents will be made aware and **IQ Consultancy LTD** will investigate fully.

## An outright ban on any corporal punishment

It is illegal to use corporal (physical) punishment. Any reported incidences of corporal punishment will be reported by **IQ Consultancy LTD** to the police.

## Care of distressed Students

Where a student is upset or distressed (for example due to homesickness) remember that sympathy and help can be given using kind words. Also, sitting with the student and listening to them until they feel better can also be of great comfort. Staff should, therefore, use their professional judgement at all times and in cases where this may be unavoidable (for example a young child who has fallen over, makes physical contact with the primary carer first or is crying with homesickness), we would recommend asking a child if physical comfort is wanted before giving it. However in the majority of cases it would not be appropriate and we do not recommend physical contact, and would encourage comforting the child as detailed above.

## One-to-one meetings

Members of staff should be mindful when meeting students on a one-to-one basis. Staff meeting students should do so in a public space, such as a school classroom, meeting room or common room. If meeting students outside of school the meetings should take place in a public area such as a coffee shop.

## Students' entitlement to privacy

Guardianship organisation staff must respect student's right to privacy. That means not entering their bedrooms (unless the homestay is required to clean the room, and this should only be undertaken with prior warning and when the student is not in the room), ensuring that bathrooms have suitably locks and respecting the student's right to retreat to their rooms or a quiet area in the home if they feel the need. When students wish to email or call home, they should be allowed to do so in privacy.

## Transporting Students

Staff may at times be expected to transport students, for example to the airport, homestay,

school or other out of school activities. A log of these journeys should be recorded. Any cars used must meet all legal requirements (e.g. MOT and insurance). Students should travel in the back of the vehicle and must wear seatbelts. Booster seats should be used where required.

## Gifts and rewards

**IQ Consultancy LTD** staff should not give gifts to students on a regular basis and should not give gifts of any significant value. Similarly, such gifts should not be given to the families of students as this could be interpreted as a gesture to groom or bribe a student. Where a reward is given to a student, this should be in accordance with agreed practice, consistent with the behaviour policy and not based on favouritism. On no account should any monetary gifts be given.

There may be occasions where students or their families may want to present you with a gift, for example as a thank you. You can accept gifts (not monetary) and hospitality, which are small gestures and are of low value. Any gift or hospitality which is more than just a token, defined as having a large value should be politely refused or returned.

## Use of photographs and videos

Staff should ensure that only photography, videos or images of students are taken with their and their parent's consent and that these are published where such consent has been obtained. Images should be securely stored and used only by those authorised to do so. Under no circumstances should staff take images of students without consent or without the students knowing that the images are being taken. Staff should always be able to justify images of students in their possession and avoid making images in one to one situations.

## Searching Students and their belongings

It may be necessary in certain circumstances to search students and belongings. This may be due to suspected possession of a prohibited item. This includes:

- knives or weapons;
- alcohol;
- illegal drugs;
- stolen items;
- tobacco and cigarette papers;
- fireworks;
- pornographic images;
- any article that a member of staff or homestay reasonably suspects has been, or is likely to be, used to commit an offence or injure a person or damage property.

Consent should be sought by the student, although a search may still be conducted if consent is

not received. It is important that such a search is handled sensitively. Homestays should contact **the DSL Kasha Handcock** Phone: **+44 (0) 7824449540** who will attend the house to undertake the search, unless it is felt that a delay may put individuals at risk. The search should be conducted with the room door open and with a witness and the student present. If a search is conducted on students, please be aware that only outer clothing (not worn next to the skin or immediately over a garment being worn as underwear) may be removed. Staff cannot carry out an intimate search; this can only be carried out by the police. A full incident report must be completed and parents informed.

## Whistleblowing

The **IQ Consultancy LTD** Whistle Blowing Policy provides guidance to staff on how to deal with malpractice in the workplace where there is concern for the safety of children.

## Safer Recruitment Policy

### Policy Statement

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

**IQ Consultancy LTD** adheres to the principles of the statutory 'Safer Recruitment' guidance for schools, and the National Society for the Prevention of Cruelty to Children (NSPCC) 'Safer Recruitment' advice.

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

This policy is supported by the Department for Education '*Keeping Children Safe in Education*' (2024). **IQ Consultancy LTD** has a rigorous process for recruiting staff in accordance with the principles of 'Safer Recruitment'. This is from point of advertisement to post induction, with on-going monitoring and safeguarding reviews.

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

## Aims of the policy

The aims of the policy are:

- To ensure that **IQ Consultancy LTD** meets the commitment to safeguarding and promoting the welfare of children and young people, by carrying out all necessary pre-employment checks as part of the Safer Recruitment process.
- To ensure that the best possible members of staff are recruited on their abilities and suitability for the advertised role in line with relevant legislation, recommendations and guidance.
- To ensure that all no applicant is treated unfairly on any grounds including race, colour, nationality, ethnicity or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age. The recruitment and selection process should ensure the identification of the person best suited to the advertised role based on the applicant's abilities, qualifications, experience and merit as measured against the job description and person specification. If a member of staff involved in the recruitment process has a close personal or familial relationship with an applicant, they must declare it as soon as they are aware of the individual's application and avoid any involvement in the recruitment and selection decision-making process.

## Recruitment procedure for staff

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

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

Advertisements for roles make **IQ Consultancy LTD** commitment to safeguarding clear by including the following statement:

**"IQ Consultancy LTD** is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share in this commitment", and reference to the responsibility for safeguarding and promoting the welfare of children in the job descriptions.

**IQ Consultancy LTD** advertisements also include the requirement for each applicant obtaining an enhanced Disclosure and Barring Service check from original identification documents and, where relevant, documents to prove their right to work in the UK. The advertisements also

include details of the post, payments and qualities required to fulfill the role.

**IQ Consultancy LTD** do not accept curriculum vitae's (CV's) drawn up by the applicant without an accompanying application form being submitted. This is because a CV presents only the information the applicant wishes to present and may omit relevant details. The application form details the safeguarding mission statement, the requirement for an applicant to have an enhanced DBS and for references to be sought prior to interview where possible. Completed application forms and accompanying CV's are stored securely on a confidential computer drive by **the Director of IQ Consultancy LTD Kasha Handcock** Phone: **+44 (0) 782 44 9540**.

**The Director of IQ Consultancy LTD Kasha Handcock** maintains the bank of job adverts securely and confidentially. This includes ensuring the job description makes reference to the responsibility for safeguarding and promoting the welfare of children. The details are circulated via online advertising organisations which require applicants to submit expressions of interest together with their CV to the company.

## The Application Form

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

The Application Form for all posts obtains:

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

- a statement of the personal qualities and experience that the applicant believes are relevant to his/her suitability for the post advertised and how s/he meets the person specification.

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

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

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

## The Job Description

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

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

## The Person Specification

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

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



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

## **The Application Information Pack**

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

- the application form;
- the job description and person specification;
- requirement to complete an enhanced DBS Disclosure;
- IQ Consultancy LTD will seek references and may approach previous employers for information and verification of experience or qualifications;
- Child Protection Policy statement;
- information about the applicant’s current employer being contacted and asked about any disciplinary offences or relevant information relating to children, where the applicant is currently working with children on a paid or voluntary basis (including expired offences).

## **Scrutinising and shortlisting applications**

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

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

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

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

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



## References

**IQ Consultancy LTD** seeks references from each application to obtain objective and factual information to support appointment decisions. References will always be sought and obtained directly from the referee with comments requested on work, professional competence and personal qualities.

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

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

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

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

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

## Invitation to interview

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

The invitation should also stress that the identity of the successful candidate will need to be checked thoroughly to ensure the person is who he or she claims to be, and that where an enhanced DBS Disclosure is appropriate the person will be required to complete an application for a DBS Disclosure straight away.

Consequently all candidates should be instructed to bring with them documentary evidence of their identity that will satisfy the requirements when applying for an enhanced DBS i.e. either a current driving licence or passport including a photograph, or a full birth certificate, plus a recent document (within the last three months) such as a utility bill or financial statement that shows the candidate's current name and address and where appropriate change of name documentation. In addition, where the candidate needs permission to work in the UK, they must produce this documentation at the interview for checking and verification. Digital copies are acceptable if interviews are conducted online.

Candidates should also be asked to bring documents confirming any educational and professional qualifications that are necessary or relevant for the post, e.g. the original or a certified copy of a

certificate, or diploma, or a letter of confirmation from the awarding body. If the successful candidate cannot produce original documents or certified copies, written confirmation of his or her relevant qualifications should be obtained from the awarding body.

A copy of the documents used to verify the successful candidate's identity, right to work and required qualifications should be kept for the personnel file. Separate copies of documents are not required to be kept in order to meet the requirements of maintaining the single central record.

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

## Interviews

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

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

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

This should include:

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

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

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

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

## **Conditional Offer of Appointment**

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

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

Where the candidate is found to be disqualified from working with children by a court; or an applicant has provided false information in, or in support of, his or her application; or there are serious concerns about an applicant's suitability to work with children, the facts must be reported to the police and/or the Independent Safeguarding Authority by the DSL.

## **Post Appointment: Induction**

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

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

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

## Maintaining a safer culture

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

## Homestays

**IQ Consultancy LTD** has an agreement with **Hosts International LTD** about providing homestays for **IQ Consultancy LTD** students. Hosts International carry the following registration with the British Council: “Hosts International meets the standards for registration with the British Council as a provider of homestay, private home and independent self-catering accommodation for adults and under-18s for accredited providers in the UK.” Hosts International is also accredited by English UK.

# Data Protection Policy

## Policy Statement

**IQ Consultancy LTD** will comply with all statutory requirements of The Data Protection Act 1998 (“the Act”) by taking all reasonable steps to ensure the accuracy and confidentiality of such information. **IQ Consultancy LTD** needs to gather and use certain information about individuals. These can be parents, students, agents, homestays, suppliers, business contacts, employees and other people the guardianship organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet **IQ Consultancy LTD** data protection standards, and to comply with the legislation.

## Policy

Why this policy exists:

This data protection policy ensures **IQ Consultancy LTD**:

- complies with data protection law and follows good practice;
- protects the rights of staff, parents, students, homestays and partners;
- is open about how it stores and processes individual’s data;
- protects itself from the risk of data breach.

## The Information Commissioner's Office

The Information Commissioner's Office (ICO) is "the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals" (ICO website). It is responsible for administering the provisions of the Data Protection Act 1998; the Freedom of Information Act 2000; and the General Data Protection Regulation 2018.

The Act requires every data controller who is processing personal information to register with the ICO (unless exempt). **IQ Consultancy LTD** is registered with the ICO as a data controller, and this is renewed annually. Registration reference number: ZB028896.

The ICO publishes a Register of data controllers on their website, on which **IQ Consultancy LTD** is listed.

## The Data Protection Act 1998

The Act protects individuals' rights concerning information about them held on computer and in any **IQ Consultancy LTD** personnel files and databases. These rules apply regardless of whether data is stored electronically, on paper or other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

## The Freedom of Information Act 2000

The Freedom of Information Act provides public access to information held by public authorities, in two ways:

- public authorities are obliged to publish certain information about their activities;
- and members of the public are entitled to request information from public authorities.

## General Data Protection Regulation 2018

The UK GDPR places greater emphasis on the documentation that data controllers must keep to demonstrate their accountability. Compliance requires organisations to review their approach to governance and how they manage data protection as a corporate issue.

**IQ Consultancy LTD** will handle and protect all information in line with data protection principles set out in the Act. Under the Act, anyone processing data must comply with the eight principles of good practice for data protection, as detailed below.

Data will be:

- fairly and lawfully processed;

- processed for limited purposes;
- adequate, relevant and not excessive in relation to the purpose(s) for which they are processed;
- accurate and kept up to date;
- not kept longer than necessary;
- processed in accordance with the data subject's rights under the Act;
- secure and protected. Appropriate technical and organisational measures are in place to protect data from unauthorised or unlawful processing and from accidental loss, damage or destruction.

**This IQ Consultancy LTD Data Protection policy** applies to personal data as defined by the Act – that is, data from which a living individual can be identified, either from data alone, or from that data and other information that is held by the data controller. This includes information held on the computer, paper files, photographs etc.

## Responsibilities

This policy applies to the main office of **IQ Consultancy LTD**, all staff, volunteers and other people working on behalf of **IQ Consultancy LTD**. The scope of the policy applies to all data held by **IQ Consultancy LTD** relating to identifiable individuals. Everyone who works for **IQ Consultancy LTD** has responsibility for ensuring data is collected, stored and handled appropriately – all must ensure personal data is handled and processed in line with this policy and data protection principles.

The data controller is responsible for:

- keeping the Director and the owners updated about data protection responsibilities, risks and issues – in the form of an annual report;
- reviewing all data protection procedures and policies;
- arranging data protection training if required;
- handling data protection queries from those working for and with **IQ Consultancy LTD**;
- dealing with requests from individuals relating to the data **IQ Consultancy LTD** holds about them;
- assisting with any agreements with third parties that may handle sensitive data;
- working with IT contractors to ensure that all systems, services and equipment used for storing data meet acceptable security standards, including ensuring regular checks, scans and updates to ensure security hardware and software are functioning properly.

The purpose of the Act is to make sure that personal data is used in a way that is fair to the individual and protects their rights, while enabling organisations to process personal data in pursuit of their legitimate aims.

## Staff guidelines

1. Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us,

and you do so at your own risk.

2. Employees should keep all data secure, taking sensible precautions and following these guidelines.
3. Strong passwords must be used, and never shared.
4. Personal data should not be disclosed to unauthorised people, either within **IQ Consultancy LTD** or externally.
5. Data should be regularly reviewed and updated if found to be out of date. If no longer required, it should be deleted and/or disposed of.
6. When not in use, paper format data or files (for instance, DBS applications) should be kept in a locked drawer or filing cabinet.
7. Employees should make sure paper and printouts are not left where unauthorised people could see them, for instance, on a printer.
8. Data printouts should be shredded and disposed of securely when no longer required.
9. When working with personal data, employees should ensure computer/laptop screens are always locked when left unattended.
10. Personal data should never be saved directly to laptops or other mobile devices like smartphones or tablets, unless encrypted.

**IQ Consultancy LTD** may collect and process the following examples of data:

- full name (including title, forename(s), family name);
- job title;
- contact information (for example, current home/business address, telephone numbers, email addresses, website address);
- qualifications/experience;
- date of birth;
- information relevant to HR (for example: C.V.s, interview notes, referee details, ID);
- student medical details;
- copies of students' passport, Visa and BRP;
- DBS reference number;
- school name and personnel;
- school year group;
- main language for correspondence;
- level of guardianship service provided;

- date of last visit for student (at homestay);
- whether private fostering assessment has been undertaken by the Local authority;
- details of venues (name, location, address, contact details);
- feedback forms;
- photographs (for example, students, staff, homestays).

**IQ Consultancy LTD** may use/process this information to:

- carry out our obligations arising from any contracts/ agreements entered into by you and us;
- contact parents, students, homestays and schools;
- undertake administrative functions (for example, HR, contact referees);
- process DBS applications;
- compile marketing lists (e.g. for newsletter and conferences);
- handle complaints;
- conduct research;
- share anonymous details with 3rd parties for the purpose of obtaining professional advice;
- understand people's views and opinions (for example, via feedback forms);
- send out information that IQ Consultancy LTD thinks might be of interest to others;
- improve our services;
- comply with legal and regulatory obligations;
- as part of the accreditation process, **IQ Consultancy LTD** is required to send the AEGIS office a copy of the contact details for their partner schools and parents subject to their consent. They will also provide the names of the students. This data is held securely by AEGIS and is destroyed once the inspection process is finished.

## Protecting your information

**IQ Consultancy LTD** has appropriate technical and organisational measures in place to protect your information. Paper files are locked away securely and electronic files are protected by access rights.

## Data accuracy

The law requires **IQ Consultancy LTD** to take reasonable steps to ensure data is kept accurate and up to date. It is the responsibility of all employees and people working with **IQ Consultancy LTD**, who work with data, to take reasonable steps to ensure it is kept accurate and as up to date as possible.

- Data should be held in as few places as necessary. Staff should not create any unnecessary additional data sets.
- Staff should take every opportunity to ensure data is updated, for instance, details can be



updated when a parent calls.

- Any data inaccuracies should be corrected as soon as discovered (for instance if a member can no longer be reached on their stored telephone number, this should be removed from the database).

## Data protection risks

This policy helps to protect **IQ Consultancy LTD** from data security risks including:

- Breaches of confidentiality, for instance: information being given out inappropriately.
- Failing to offer choice, for instance: all individuals should be free to choose how the company uses data relating to them.
- Reputational damage, for instance: the company could suffer if hackers successfully gained access to sensitive data.

## Accessing your information

Under the Act, an individual is entitled to ask **IQ Consultancy LTD**:

- for a copy of the personal information held by IQ Consultancy LTD;
- for any inaccuracies to be corrected;
- how to gain access to such data;
- how they are meeting their data protection obligations.

Such requests are known as 'subject access requests'. Such requests should be made either via email. Email requests should be addressed to the data controller at [k.handcock@iqconsultancy.uk](mailto:k.handcock@iqconsultancy.uk).

There is no administration charge for any subject access request. The data controller will aim to provide the relevant data within 14 working days. The data controller will always verify the identity of anyone making a subject access request before handing over any information.

## Sharing your personal information

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances, **IQ Consultancy LTD** will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the Director, and by taking legal advice where necessary. If on the rare occasion, we need to share data, we will only use data anonymously. If personal information is shared, it will be done so in line with the Act. You are entitled to know why and how we are sharing your personal information and the organisation or individual receiving your personal information will be required to protect your information in line with the Act.

## Logging and recording of communications with individuals

**IQ Consultancy LTD** may log communications with you for the purposes described earlier in this policy.

Links to other websites on the **IQ Consultancy LTD** website.

Our website includes links to other websites (for example: to other organisations dealing with boarding

students, government departments and agencies). We are not responsible for the data protection and privacy practices of these organisations, including their website. This Data Protection Policy applies to **IQ Consultancy LTD** only.

## Providing information

**IQ Consultancy LTD** aims to ensure that individuals are aware that their data is being processed and that they understand:

- how the data is being used;
- how to exercise their rights.

To these ends, a copy of this policy which sets out how data relating to individuals is used by **IQ Consultancy LTD** can be available on request. This policy is also available on the **IQ Consultancy LTD** website.

If you have any questions about this policy, please contact the Data Controller at **IQ Consultancy LTD** via email at [k.handcock@iqconsultancy.uk](mailto:k.handcock@iqconsultancy.uk).

## Privacy Policy

**IQ Consultancy LTD** is dedicated to safeguarding and preserving your privacy when visiting our site or communicating electronically with us.

This Privacy Policy, together with our terms of use, explains what happens to any personal data that you provide to us, or that we collect from you when you are on this site.

## Information We Collect

In operating our website we may collect and process the following data about you:

- Details of your visits to our website and the resources that you access, including, but not limited to, traffic data, location data, weblogs and other communication data.
- Information that you provide by filling in forms on our website
- Information provided to us when you communicate with us for any reason.

## Use of Cookies

We may on occasion gather information regarding your computer whilst you are on our website. This enables us to improve our services and to provide statistical information regarding the use of our website to our advertisers where appropriate.

Such information will not identify you personally it is statistical data about our visitors and their use of our site. This statistical data does not identify any personal details whatsoever.

Similarly to the above, we may gather information about your general internet use by using a cookie file. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your computer as cookies contain information that is transferred to your computer's hard drive. They help us to improve our website and the service that we provide to you.

All computers have the ability to decline cookies. This can be done by activating the setting on your browser which enables you to decline the cookies. Please note that should you choose to decline cookies, you may be unable to access particular parts of our website.

Our advertisers may also use cookies, over which we have no control. Such cookies (if used) would be downloaded once you click on advertisements on our website.

## Google Adwords Remarketing

**IQ Consultancy LTD** also uses 3rd party vendor re-marketing tracking cookies, including the Google Adwords tracking cookie. This means we will continue to show ads to you across the internet, specifically on the Google Content Network (GCN). As always we respect your privacy and are not collecting any identifiable information through the use of Google's or any other 3rd party remarketing system.

The third-party vendors, including Google, whose services we use – will place cookies on web browsers in order to serve ads based on past visits to our website. – Third party vendors, including Google, use cookies to serve ads based on a user's prior visits to your website. This allows us to make special offers and continue to market our services to those who have shown interest in our service.

## Use of your information

The information that we collect and store relating to you is primarily used to enable us to provide our services to you. In addition, we may use the information for the following purposes:

- To provide you with information requested from us, relating to our products or services.
- To provide information on other products which we feel may be of interest to you, where you have consented to receive such information.
- To meet our contractual commitments to you.
- To notify you about any changes to our website, such as improvements or service/product changes, that may affect our service. \* If you are an existing client, we may contact you with information about services similar to those which were the subject of a previous sale to you. \* Further, we may use your data, or permit selected third parties to use your data, so that you can be provided with information about unrelated goods and services which we consider may be of interest to you. We or they may contact you about these goods and services by any of the methods that you consented at the time your information was collected. \* If you are a new client, we will only contact you or allow third parties to contact you only when you have provided consent and only by those means you provided consent for. \* If you do not want us to use your data for our or third parties you will have the opportunity to withhold your consent to this when you provide your details to us on the form on which we collect your data.
- Please be advised that we do not reveal information about identifiable individuals to our advertisers but we may, on occasion, provide them with aggregate statistical information about our visitors.

## Storing Your Personal Data

Data that is provided to us is stored on our secure servers. Details relating to any transactions entered into on our site will be encrypted to ensure its safety.

The transmission of information via the internet is not completely secure and therefore we cannot

guarantee the security of data sent to us electronically and transmission of such data is therefore entirely at your own risk. Where we have given you (or where you have chosen) a password so that you can access certain parts of our site, you are responsible for keeping this password confidential.

## Disclosing Your Information

Where applicable, we may disclose your personal information to any member of our company.

We may also disclose your personal information to third parties:

- Where we sell any or all of our business and/or our assets to a third party.
- Where we are legally required to disclose your information.
- To assist fraud protection and minimise credit risk.

As part of our accreditation process we need to share contact details with AEGIS head office and lead and supporting inspectors. We permit them to process your data only for specified purposes and in accordance with GDPR.

Where your data is shared with AEGIS head office and lead and supporting inspectors, we will seek to share the minimum amount necessary.

## Access To Information

The Data Protection Act 1998 and General Data Protection Regulation 2016 gives you the right to:

- Access and obtain a copy of your data on request
- Require the organisation to change incorrect or incomplete data
- Require the organisation to delete or stop processing your data
- Choose to remove your consent for us to process your data
- Object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing.

If you have any questions about this policy, please contact the Data Controller at **IQ Consultancy LTD** via email at [k.handcock@iqconsultancy.uk](mailto:k.handcock@iqconsultancy.uk).

## Student Behaviour Code of Conduct

### Statement

**This Student Behaviour Code of Conduct** outlines the positive behaviour it expects from students. It also provides information about specific laws in the UK. The aim is to provide guidance in key areas of **IQ Consultancy LTD** expectations. The guidance is written for the benefit of students, parents and staff.

## Behaviour Code of Conduct

### Behaviour and conduct when staying with a Homestay

**IQ Consultancy LTD** expects all of their students to be polite and courteous when staying with a homestay (host family). In the UK, it is expected that you say “please” and “thank you” when asking for and receiving items. Your homestay is not a hotel and the expectation is that you will be included as part of the family. As such, you will be expected to engage with family members, joining them at mealtimes, and possibly helping with chores such as laying the table. Your homestay will explain their own house rules with you when you arrive. Please do ask them if you have any questions.

### Curfew arrangements

Students must have permission from the host family before going out unaccompanied. Homestays will outline the area where the students are allowed to go to unaccompanied.

Students who have permission to go out on their own will be required to return to homestays by the following times:

	Sunday – Thursday	Friday – Saturday
14 year old	6:30 pm	7:30 pm
15 year old	6:30 pm	8:00 pm
16 year old	6:30 pm	9:00 pm
17–18 year old	7:00 pm	10:00 pm

All students who are permitted to go out unaccompanied by their homestay must take their mobile phone (fully charged) with them and keep this switched on. It is important that if students do go out unaccompanied, that they let the homestay know where they are going and roughly know how long they will be out. If for any reason they are delayed, students must contact the homestay to inform them. **It is polite to inform your host families if you will not be back in time for the evening meal.**

If students have weeknight activities or work commitments, later weeknight home times can be negotiated, however it is expected that homestay students will usually eat dinner with their homestay families, and focus on their studies in the evenings.

Students should be reminded of the following for their own safety:

- do not carry too much cash;
- travel in a group whenever possible.

**IQ Consultancy LTD** suggests that student bedtimes should be as follows:

	Sunday – Thursday	Friday – Saturday
11–13 year old	9:30 pm	10:30 pm
14–15 year old	10:00 pm	11:00 pm
16–17 year old	10:30 pm	11:00 pm

Any deviation to these times should be discussed with the homestay.

### Use of the kitchen area

Most homestays will prepare meals for you (breakfast, lunch and dinner). You may want to help the family in their meal preparations or cook something yourself. Please do talk to your homestay about this and they will advise you how to use the kitchen and the necessary safety rules. If you have your own food that you wish to eat during your stay, please let your homestay know so that this can be stored safely (for instance in a fridge if required). You will be able to access drinks and snacks throughout the day, such as fruit or biscuits. Your homestay will explain how you can access these.

### Use of the bathroom

Students are asked to be respectful of the family routines. If you are sharing a bathroom, please be considerate with the time taken to shower and bathe as others may need to use the facility. Please leave the bathrooms tidy. Some families may have limits on the amount of hot water available each day due to their boiler capacity. Please discuss the best times for showering or taking a bath. It is not usually necessary to shower or bathe more than once a day. Please ensure that you lock the door of the bathroom when in use and ensure that you are suitably clothed when travelling to and from the bathroom.

### Use of the Wi-Fi / access to the home computer

Please discuss Wi-Fi access with your homestay. Some families have packages where they have a limit on the data they may use in a month; therefore streaming films for example would be inappropriate. Please note that homestays may have filters on their internet and may use parental controls to prevent access to inappropriate sites. Some homestays may turn off the Wi-Fi at bedtime. Students should use their own devices rather than the family's home computer.

### Laws regarding the consumption of alcohol

**IQ Consultancy LTD** does not permit their students to consume alcohol whilst under their care, including when they are staying at a homestay. In the UK it is illegal for people under 18 to buy alcohol in a pub, off-licence, shop or elsewhere. In most cases, it is against the law for anyone to buy alcohol for someone under 18 to drink in a pub or a public place.

### Laws regarding the use of drugs and illegal substances

**IQ Consultancy LTD** prohibits students from using recreational drugs and illegal substances whilst in their care. In the UK you can get a fine or prison sentence if you:

- take drugs;
- carry drugs;
- make drugs;
- sell, deal or share drugs (also called 'supplying' them).

If you are under 18, the police are allowed to tell your parent or guardian that you've been caught with drugs.

### **Laws regarding smoking**

**IQ Consultancy LTD** prohibits students from smoking whilst in their care. In the UK, it is illegal to buy cigarettes if you are under the age of 18.

### **Laws regarding sexual activity**

**IQ Consultancy LTD** prohibits students from engaging in sexual activity whilst in their care, even if they are over the age of consent. In the UK the age of consent is 16. That means that it is illegal to have sex with someone under the age of 16.

### **Laws regarding tattoos and body piercings**

**IQ Consultancy LTD** prohibits students from having a tattoo or body piercing whilst in their care. In the UK, it is illegal to tattoo a young person under the age of 18, even if they have parental consent. There is no legal age of consent for body piercing, and so it is legal for someone under the age of 18 to have a piercing as long as they have consented to it.

### **Arrangements when Students wish to stay away from the homestay**

While staying with your homestay you are not allowed to stay away from the homestay unless permission has been given by **IQ Consultancy LTD**. A request regarding alternative half term / exeat care arrangements needs to satisfy the following rules:

#### **Students Aged 17 and 18 or over**

Parents need to give us a written notice by verified email. The full address must be provided to comply with the rules for a UK Tier 4 (Child) VISA.

#### **Students Aged 16**

As above PLUS we require a named adult, residing in the UK and over 25 years old, who will take responsibility for the student during the stay.

#### **Students Aged 15 or under**

As above PLUS we require full contact with the named adult and arrangement confirmed in writing. The adult will need to confirm that they will be taking full responsibility for the student during the break.

An arrangement to stay away is subject to **IQ Consultancy LTD** and/or school staff being satisfied that a child will be safe. We reserve the right to veto any arrangement if we feel it is unsatisfactory in any way.

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

These policies were last reviewed on 06/06/2025.

The next review is on 06/06/2026.

Signed: Kasha Handcock DSL 06/06/2025.