

Safeguarding & Child Protection Policy

Statement of Commitment

ICON is committed to safeguarding and promoting the welfare of all children under our care. We strive to create a safe environment where children feel secure, valued, and listened to, and where their best interests are at the heart of all decisions and actions taken.

The purpose of this policy is to make sure that the actions of any adult in the context of the work carried out by the organization are transparent and safeguard and promote the welfare of all young people.

When a safeguarding concern arises, ICON will actively listen to the child, ensuring their wishes and feelings are heard and considered in all decision-making processes. The child's best interests will remain at the heart of any actions taken, with appropriate support provided to ensure they feel safe and valued throughout.

All staff and host families should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected. Some may not recognise their experiences as harmful. This should not prevent staff from remaining professionally curious and raising concerns with the Designated Safeguarding Lead (DSL).

Keeping Children Safe & Responding to Concerns

To protect children, ICON will:

Ensure a robust reporting procedure for all safeguarding concerns: All staff and host families will be trained to recognise and report safeguarding concerns promptly. Concerns must be reported to the Designated Safeguarding Lead (DSL) or a deputy DSL without delay. Clear escalation procedures will be in place for cases where immediate action is needed to protect a child from harm.

Train all staff and host families in safeguarding procedures: Regular training sessions will be provided to ensure all staff and host families understand their safeguarding responsibilities. This includes recognising signs of abuse and neglect, handling disclosures sensitively, and following the correct reporting procedures. Annual refresher training will be mandatory, with additional updates provided when policies or statutory guidance change.

Maintain clear lines of communication between children, staff, and external agencies: Children will be encouraged to voice any concerns they have through clearly established reporting mechanisms. Staff and host families will be trained to engage with children in a way that builds trust and encourages open communication. A designated safeguarding email and telephone helpline will be available for reporting concerns.

Work closely with Local Safeguarding Partners (LSPs) and other relevant authorities: ICON will actively engage with Local Safeguarding Partners (LSPs), social services, law enforcement, and other

agencies to ensure a coordinated response to safeguarding concerns. This includes sharing information where necessary to protect children, attending safeguarding meetings, and following the latest statutory guidance to enhance child protection efforts.

For more detailed guidance on responding to immediate risks or incidents, please refer to our **Emergency Procedures**.

Recognising Abuse

Abuse or neglect of a child or young person is caused by inflicting harm, or by failing to act to prevent harm. Children or young people may be abused in a family or in an institutional or community setting: by those known to them or more rarely by a stranger.

Physical Harm

This may involve hitting, shaking, throwing, poisoning, burning, drowning, suffocating or any other action that may cause physical harm. Physical harm may also be caused when a parent or care fabricates the symptoms of or deliberately induces illness.

Children acquire cuts and bruises as part of daily life, but injuries should always be interpreted in light of a child's developmental stage, the explanation given of the injury and the prior knowledge of the child.

Physical signs a child or young person may be experiencing physical harm:

- Injuries they are unable to explain
- Injuries that have been left untreated
- Injuries to a part of the body where accidental injury is unlikely i.e. chest or cheeks
- Injuries made with a clearly marked object such as a buckle or cigarette end
- Bruising to the face, arms, ears or hands.

Neglect

This is the present failure to meet a child or young person's basic physical and/or psychological need, likely to result in the serious impairment of their health or development. Neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter
- Protect a child from physical and emotional harm or danger, such as domestic violence
- Ensure adequate supervision
- Ensure access to appropriate medical care or treatment
- Be responsive to a child's basic emotional needs.

Sexual abuse

This is sometimes considered to be the most difficult type of abuse to consider. However, the sexual abuse of children and young people has devastating effects on both the individual and their family. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities whether or not the child is aware of and can understand what is happening.

The activities may involve physical contact, including assault by penetration, for example rape or oral sex. They may also involve non-penetrative acts such as kissing, rubbing, masturbation and touching outside of clothing.

Non-contact activities such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or young people to behave in sexually inappropriate

ways and grooming children or young people in preparation for abuse all come under the sexual abuse category.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse as can other children and young people. Sexual abuse can also be experienced by a wide range of people so it is important to remember that anyone can be a victim.

Emotional abuse

This is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child or young person's emotional development.

Emotional abuse can take the form of:

- Conveying that an individual is worthless, unloved, inadequate or valued only in so far as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing or ridiculing them for what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed this may include interactions that are beyond developmental capacity, overprotective and limitation of exploration and learning, preventing the individual from participating in normal social interaction
- Seeing or hearing the ill-treatment of another person
- Bullying, including cyber bullying
- Causing children or young people frequently to feel frightened or in danger
- Exploitation or corruption of children/young people.

Emotional abuse accompanies all other types of maltreatment but it may occur as the sole or main form of abuse.

Reporting a concern

Children and young people may disclose details of abuse through conversation or questioning. All staff must be aware of the reporting procedure. Confidentiality should never be promised and children/young people should not be asked leading questions. If you need to make some notes when a young person makes a disclosure, do so immediately while the information is fresh in your mind.

Any concerns or disclosures should be reported to the designated lead for safeguarding (Appendix 1). All staff, including host families will receive training on safeguarding and how to deal with these situations.

Contact details for all Local Safeguarding Boards can be found in Appendix 2, where further advice and guidance can be sought.

Parents will be notified of any safeguarding concerns at the most appropriate time and offered full support throughout any subsequent investigation. School staff will be made aware of any concerns providing there is no risk to the child by doing so.

Immediate action to ensure safety

Immediate action may be necessary at any stage in involvement with children and families.

IN ALL CASES IT IS VITAL TO TAKE WHATEVER ACTION IS NEEDED TO SAFEGUARD THE CHILD:

- If emergency medical attention is required, this can be ensured by calling an ambulance (dial 999) or taking a child to the nearest Accident and Emergency Department.
- If a child is in immediate danger the police should be contacted (dial 999) as they alone have the power to remove a child immediately if protection is necessary, via Police Protection Order.

We recognise that due to the sensitive nature of certain situations you may not feel comfortable about discussing your concerns. Below is a list of people who you can turn to:

- Helen Zhao, Guardianship Manager – helen.zhao@iconedu.co.uk
- Ardis Wang, Director- ardis.wang@iconedu.co.uk

You can raise concerns by email, orally or in writing, stating that you are using the Whistle Blowing Policy.

We request that, where possible, you include the information below in your disclosure:

- An outline of the known or suspected wrongdoing
- Details, to the best of your knowledge, about when, where and how it occurred
- A list of names of those suspected of being involved
- A list of names of anyone who may have relevant information
- Details of how you came to know about the situation
- What, if any, breaches of company policies or procedures have taken place
- The names of anyone you have discussed this incident with
- Your name and contact details - these will be kept confidential as far as is reasonably practicable
- The date and time of making the report.

You will not be expected to prove the wrongdoing that you believe you have witnessed or suspected.

We understand that some individuals may wish to make a disclosure anonymously, when this is the case, we will endeavour to investigate your concerns fully, although an investigation may be impeded if we cannot obtain further information from you.

Investigation Process

The person you contact will acknowledge receipt of your concern within 2 working days and discuss the next steps with you.

We will decide the most appropriate course of action to take in line with this policy. A full investigation will be conducted as speedily and sensitively as possible in accordance with all relevant laws and regulations. If appropriate you will be regularly informed on the progress of the

investigation and any action being taken. The purpose of the investigation is to:

- Establish if any wrongdoing has occurred, and if so to what extent.
- Minimise the risk of further wrongdoing.

It is not possible to set a specific timeframe for completion of investigations in advance, as the diverse nature of potential disclosures makes this unworkable, however they will be dealt with fully, promptly and as fairly as possible.

Where it is believed that criminal activity has taken place, the matter may be reported to the Police and appropriate legal action taken.

Addressing Child-on-Child Abuse

Investigation & Response

Any allegations of peer-on-peer abuse, including sexual violence and harassment, will be taken seriously and investigated thoroughly. All reports will be handled in line with statutory guidance and best practices to ensure a fair and supportive response for all parties involved.

Supporting the Victim

Victims will be reassured, supported, and protected from further harm. This may include:

- Providing access to a trusted staff member for emotional support.
- Referrals to external agencies such as child protection services or counselling providers.
- Implementing a safety plan to reduce any risk of further abuse.
- Ensuring appropriate accommodations, such as separate living arrangements if necessary.

Addressing the Alleged Perpetrator

The alleged perpetrator will also be provided with support, while ensuring appropriate safeguarding measures are in place. This may include:

- Supervised interactions with other children.
- Referral to behavioural support services.
- Disciplinary actions in line with school policies and legal obligations.

Preventive Measures

ICON will implement proactive strategies to minimize the risk of child-on-child abuse, including:

- Educating children about consent, respect, and healthy relationships.
- Providing clear reporting mechanisms for students.
- Regular staff training on identifying and responding to peer abuse.
- Promoting an inclusive and safe environment that discourages harmful behaviours.

Confidentiality & Information Sharing

Safeguarding information will be shared on a need-to-know basis, ensuring privacy for all involved while complying with legal obligations.

Allegations Against Staff or Host families

Serious Allegations (Meeting the Harm Threshold): Any allegations that meet the harm threshold—meaning a member of staff or homestay has:

- Behaved in a way that has harmed or may have harmed a child.
- Committed a criminal offence against or related to a child.
- Behaved in a way that indicates they may pose a risk to children—will be referred to the Local Authority Designated Officer (LADO) for further investigation. The individual may be suspended pending the outcome of the inquiry.

Low-Level Concerns: Any concerns that do not meet the harm threshold but indicate inappropriate or concerning behaviour will be:

- Recorded and monitored.
- Managed internally by the DSL or senior leadership.
- Reviewed regularly to identify patterns or escalating risks.

Full details on how low-level concerns are identified, reported, and recorded can be found in our dedicated **Low-Level Concerns Policy**, which complements this Safeguarding Policy. This policy is available on our website or upon request.

Support for Staff Under Investigation: Staff members facing allegations will be treated fairly and provided with appropriate support. They will have access to an independent HR advisor and be given an opportunity to respond to the allegations in line with due process.

Whistleblowing & Reporting: Staff and homestays are encouraged to report any safeguarding concerns about their colleagues. Whistleblowing policies will protect those who report in good faith from retaliation.

Self-Reporting: Staff and host family must self-report any concerns regarding their conduct that may pose a risk to children.

Systems for Children to Report Abuse

Multiple Reporting Channels: Children are provided with a variety of safe and accessible ways to disclose concerns, including:

- Speaking to a trusted adult such as a teacher, homestay, or the DSL.
- Using an anonymous reporting system if they do not feel comfortable speaking directly.
- Contacting a designated safeguarding helpline or email address.

Taking Reports Seriously: All reports will be taken seriously and acted upon promptly, ensuring:

- The child feels heard, believed, and supported.
- Immediate safety measures are put in place if necessary.
- The DSL investigates and records concerns appropriately.
- Relevant external agencies are informed when required.

Ensuring Confidentiality & Protection:

- Information will be shared only with those who need to know.
- No child will face repercussions for reporting abuse.
- Follow-up support will be provided to ensure the child's ongoing wellbeing.

When receiving Disclosures, staff must:

- Listen carefully and remain calm, provide a reassuring presence and allow the child to speak freely, maintain appropriate eye contact and body language to show attentiveness.
- Avoid leading questions, use open questions where necessary, do not put words into the child's mouth or suggest answers.
- Reassure the child while explaining that confidentiality cannot be guaranteed, explain that the information they share may need to be passed on to keep them safe.
- Report to DSL immediately, make an accurate, factual record of what was said ASAP, do not investigate the concern yourself but ensure that the appropriate safeguarding procedure is followed.

Safeguarding records management & information sharing

Records will be:

- Kept securely in a protected digital or physical format with restricted access.
- Maintained in compliance with data protection regulations.
- Updated in a timely manner to reflect any safeguarding developments.
- Shared only when necessary for child protection, ensuring all information is relevant and appropriate.
- Retained for the necessary period in line with legal requirements before secure disposal.

Information will be shared on a strict need-to-know basis, ensuring confidentiality is upheld while prioritising child welfare.

- Staff must seek guidance from the DSL before sharing any safeguarding information.
- Safeguarding information may be shared with:

- Local Safeguarding Partners (LSPs) or Local Authority Children's Services where there is a safeguarding risk.
 - Schools, homestays, or other relevant parties involved in the child's care, only when necessary.
 - Law enforcement agencies where required by law.
 - Any safeguarding information shared must be treated as confidential and must not be disclosed beyond the intended recipients.
- Parents will be informed of safeguarding concerns unless doing so would put the child at further risk.

Role of the Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) is responsible for overseeing and managing all safeguarding and child protection concerns within the organisation. Their key responsibilities include:

1. Leadership & Oversight

- Act as the main point of contact for all safeguarding concerns.
- Ensure all safeguarding policies and procedures are up to date and in line with legal requirements.
- Provide leadership in creating a safe and supportive environment for children.
- Liaise with external safeguarding agencies, such as local authorities and law enforcement.

2. Responding to Safeguarding Concerns

- Receive and assess reports of abuse, neglect, or other child protection concerns.
- Take appropriate action, including reporting to external agencies where necessary.
- Ensure all concerns are documented accurately and confidentially.
- Provide immediate support and guidance to children and staff regarding safeguarding issues.

3. Training & Awareness

- Deliver safeguarding training to all staff, volunteers, and homestays.
- Ensure staff are aware of signs of abuse, neglect, and child exploitation.
- Promote a culture of vigilance, professional curiosity, and proactive safeguarding.

4. Record-Keeping & Information Sharing

- Maintain secure and confidential safeguarding records.
- Share information on a need-to-know basis, prioritising child welfare.
- Ensure compliance with data protection regulations regarding safeguarding information.

5. Managing Allegations & Disclosures

- Support staff in handling disclosures sensitively and appropriately.
- Ensure that allegations against staff or homestays are investigated properly.
- Liaise with the Local Authority Designated Officer (LADO) in cases of serious allegations.

6. Contact Information

Helen Zhao – Designated Safeguarding Lead

Email: helen.zhao@iconedu.co.uk

Contact number: 07539172484

Training

All staff new to the company will receive induction training that will include an introduction to ICON's safeguarding policies and guidance on safe working practices.

All ICON staff will receive annual in-house safeguarding training to ensure they remain fully updated on any changes to legislation. Homestays will complete an initial training document relating to safeguarding when they register with the organisation. Any changes in legislation or important updates will be communicated directly to homestays either through the newsletter or via email.

During annual visits homestays will complete a safeguarding refresher document.

Whistleblowing

Our Goals & Commitment

At ICON, we are guided by our core values, which shape how we conduct ourselves and interact with colleagues, clients, and partners. We encourage feedback and provide a clear avenue for individuals to speak up about misconduct. Our whistleblowing policy ensures that:

- Every employee has the opportunity to report concerns anonymously.
- All reports are taken seriously, investigated, and acted upon appropriately.
- The identities of informants are protected unless they choose to disclose themselves.
- Investigations are conducted thoroughly, with documented results and feedback where appropriate.

What Conduct Should Be Reported

We encourage reports of any behaviour that is:

- Dishonest, fraudulent, or corrupt.
- Illegal (e.g., theft, drug-related offences, violence, or property damage).
- Unethical, including breaches of company policies such as the Code of Conduct.
- Oppressive, grossly negligent, or harmful to employees, the company, or third parties.
- A danger to public safety or the financial system.
- Harassment, discrimination, victimisation, or bullying.
- Conduct detrimental to ICON that could result in financial or reputational damage.

How to Make a Report

Reports of misconduct can be made to the designated Whistleblower Protection Officers:

- Case Managers:
 - Helen Zhao – helen.zhao@iconedu.co.uk
 - Zoe Ni – zoe.ni@iconedu.co.uk
- Duty Manager:
 - Ardis Wang- ardis.wang@iconedu.co.uk

Anonymity Protection

- Employees have the option to remain anonymous throughout the reporting and investigation process.
- If an individual chooses to disclose their identity, ICON will document who within the organisation has access to this information and take all necessary steps to prevent retaliation.
- Anonymity is maintained unless the informant voluntarily reveals their identity.

Investigation Process

Once a report is received, the investigation follows these steps:

- Report Submission: The report (anonymous or otherwise) is received.
- Case Manager Assignment: A case manager is assigned to assess and confirm receipt of the report.
- Initial Assessment: The case manager evaluates the validity of the report and seeks permission to proceed with an investigation.
- Investigation Begins: The case manager conducts the investigation, which may include corresponding with the informant if a communication channel exists.
- Progress Updates: The case manager provides updates to both management and the informant per policy guidelines.
- Investigation Conclusion: Once the investigation is complete, findings are documented and shared with management and, where appropriate, the informant.
- Next Steps: Management reviews the findings and takes any necessary corrective actions.

Confidentiality

Confidentiality must be exercised at all times by all employees, host families, and parents, care must be taken not to disclose information of any kind that is not for public knowledge this can include but is not limited to:

- Private student information
- Private Host family information
- Contact details
- Business details

Further guidance on Data Protection can be found in Data protection policy.

Liaison with Local Safeguarding Partners (LSPs)

ICON is committed to working closely with Local Safeguarding Partners (LSPs) to ensure the highest standards of child protection and welfare. We recognise the vital role that LSPs play in coordinating safeguarding efforts and responding to concerns.

We will:

- Maintain regular communication with LSPs to stay informed of best practices and legal requirements.
- Report safeguarding concerns to the relevant LSP in a timely and appropriate manner.
- Cooperate fully with any investigations or interventions initiated by LSPs.
- Ensure that staff, homestays, and volunteers are aware of the role of LSPs and how to seek guidance when necessary.
- Participate in multi-agency safeguarding training and initiatives to enhance our safeguarding practices.

LSP Contact Details can be found in Appendix 2

Liaison with Parents and Schools

At ICON, we recognise the importance of maintaining effective communication with parents and partner schools to ensure the safety and well-being of the children in our care. We are committed to a collaborative approach, which includes informing and involving parents and schools in safeguarding matters, as appropriate.

We will:

- Engage with Parents: Ensure that parents are aware of our safeguarding policies and practices, and encourage them to raise any concerns they may have regarding their child's well-being.
- Share Relevant Information: With due regard for confidentiality and child protection, we will share relevant safeguarding concerns with parents and, where necessary, partner schools to ensure the child's needs are met.
- Work with Schools: Liaise with partner schools when concerns arise, ensuring that safeguarding information is passed on promptly and in accordance with our policies. This ensures a coordinated approach to support the child.

- Support Parental Involvement: Where appropriate, involve parents in decision-making processes regarding the safety and welfare of their child.
- Respond to Allegations: In the event of a safeguarding allegation involving a child, we will work with the child's school and parents to ensure a clear, supportive plan of action.

Supporting Procedures & Policies

This policy is supported by the following procedures and policies:

- Emergency Procedures
- Low-Level Concerns Policy
- Anti-Bullying Policy
- Online Safety Policy
- Mental Health & Wellbeing Policy
- Safer Recruitment Policy
- Data Protection Policy
- Missing Student Policy
- Prevent/Anti-Radicalisation Policy
- Health and Safety Policy
- Complaint Policy
- Whistleblowing Policy

You could find these policies at our website www.iconedu.co.uk

Key Definitions

Abuse: Abuse is any form of maltreatment of a child and covers every form of 'abuse', including sexual, emotional, psychological, material, financial, physical, discriminatory or organisational abuse.

Child Protection: Actions taken to protect a child suffering or at risk of suffering significant harm.

DBS: DBS is the acronym used for the Disclosure and Barring Service. The DBS is a governmental body.

DSL: The Designated Safeguarding Lead refers to the individual within an organisation who's responsible with management, oversight and coordination where allegations are made or concerns raised about a person.

GDPR: GDPR stands for the General Data Protection Regulation. This is an EU regulation and law on data protection and privacy for all individuals within the EU and EEA.

Harm: Harm refers to any ill-treatment including sexual abuse and ill-treatment that isn't physical, the avoidable deterioration and or impairment in physical or mental health. of physical, intellectual, emotional, social or behavioural development.

Safeguarding: Protecting children from maltreatment, preventing impairment of health or development, ensuring safe and effective care, and promoting positive outcomes.

Appendix 1

For any queries, please contact the following staff members

Safeguarding:

Helen Zhao – Designated Safeguarding Lead

Email: helen.zhao@iconedu.co.uk

Contact number: 07539172484

Behaviour:

Zoe Ni – Designated Safeguarding Officer

Email: zoe.ni@iconedu.co.uk

Contact number: 07761727376

Data Protection or General:

Ardis Wang

Email: ardis.wang@iconedu.co.uk

Contact number: 07702265983

Appendix 2

Local Safeguarding Partners Contact details

Area	Address	Tel.No	Email
Nottinghamshire	County Hall, West Bridgford, NG2 7QP	01159773935	Info-nscb@nottscc.gov.uk
Sheffield	Floor 3 South, Howden House, Union Street, S1 2SH	01142734450	victoria.horsefield@sheffield.gov.uk
Leeds	Leeds Safeguarding Children Board, 2 Great George St, LS2 8BA	01133950297	leedsiscb@leeds.gov.uk
Devon	The Devon Children's and Families Partnership	0345 155 1071	mashsecure@devon.gov.uk.
Gloucestershire	Business Unit, Room 128, Block 4, Shire Hall, Gloucester, GL1 2TH	01452583629	mail@gscb.org.uk
Huddersfield	Kirklees Safeguarding Children Board, 3 rd Floor, Somerset Buildings, 10 Church Street, Huddersfield, HD1 1DD	01484225161	caroline.rhodes@kirklees.gov.uk
North Yorkshire	South Block, NYCC, County Hall, Racecourse Lane, Northallerton, DL7 8AE	01609535187	dallas.frank@northyorks.gov.uk

ICON will liaise directly with all relevant parties when dealing with any issues relating to safeguarding. The Local Authority Designated Officer (LADO) will be contacted by the Designated Safeguarding Lead (DSL) for any advice or guidance, or where necessary, to make an immediate referral to Children's Services.

Further contact details are available via the internet should a young person be in a different Local Safeguarding Partnerships area to those recorded above.

Policy Review

ICON is committed to ensuring this policy remains fit for purpose, it will be reviewed annually and updated accordingly.

Last Updated 02.04 2025

Next review date: 01.04.2026