



Safeguarding and Child Protection Policy and Procedure

Guardianship Organisation · AEGIS Accredited

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Applies to	All directors, staff, volunteers, homestays, students, parents and agents

Statutory basis. This policy has been written to align with Keeping Children Safe in Education 2026 (in force 1 September 2026), Working Together to Safeguard Children (current version) and the AEGIS Code of Practice and Quality Standards for Guardianship Organisations.

A note on applicability. Keeping Children Safe in Education, referred to throughout as KCSIE, is statutory guidance for schools and colleges. BOSSS UK is a guardianship organisation and is not a school, so KCSIE does not apply to it directly. BOSSS UK nevertheless adopts KCSIE as its safeguarding standard because AEGIS requires accredited guardianship organisations to align with it, and because our staff and homestays care for the same children outside term time. Where a KCSIE requirement is written for a school setting, we apply the equivalent proportionate arrangement and say so.

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Part 1 Our commitment to safeguarding

"BOSSS Guardians is committed to safeguarding and promoting the welfare of children and young people. Our ethos is to drive our core values from the top. This means that all Directors and owners of our guardianship organisation lead by example and have appropriate safeguarding knowledge and oversight of all procedures. We expect all staff, volunteers and homestays to share these core values that underpin our organisation."

Mission statement, approved by the Compliance Director

1.1 The purpose of this policy and its associated documents is to:

- provide protection for every child under our guardianship, so that each child is safe and protected from harm; and
- provide students, staff, volunteers, homestays, parents and partner schools with clear guidance on the procedures they must follow if they suspect that a student may be experiencing, or be at risk of, harm.

1.2 This means we will always work to:

- protect children and young people in our care from maltreatment. All students, regardless of age, disability, sex, gender reassignment, racial heritage, religious belief, sexual orientation or any other protected characteristic, have the right to equal protection from all types of harm or abuse;
- prevent impairment of our students' mental or physical health or development;
- ensure that students in our care grow up in circumstances consistent with the provision of safe and effective care; and
- promote an inclusive and anti-discriminatory culture across our organisation, our homestay network and our student body.

1.3 This policy should be read alongside the following guidance, in each case the current version:

- Keeping Children Safe in Education, referred to in this policy as KCSIE
- Working Together to Safeguard Children
- What to do if you are Worried a Child is Being Abused: Advice for Practitioners
- Information Sharing: Advice for Practitioners Providing Safeguarding Services
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges
- Working Together to Improve School Attendance
- Generative Artificial Intelligence in Education, Department for Education
- The AEGIS Code of Practice and Quality Standards for Guardianship Organisations

1.4 This policy applies to all students, staff, volunteers, homestays, contracted drivers and anyone else working on behalf of BOSSS UK. KCSIE applies to providers of post-16 education as set out in the Education and Training (Welfare of Children) Act 2021, and we apply this policy to all students in our care irrespective of age.

- 1.5** This policy is discussed with our staff, volunteers and homestays at induction and at each annual review, and with our students on arrival, to ensure the content is understood.

1.6 What changed in version 3.0

Version 3.1 aligns our insurance arrangements, and our approach to policy reading, with the AEGIS Quality Standards. BOSSS UK no longer collects home or vehicle insurance documentation from homestays. Standards 2.4.2 and 2.4.3 require us to make homestays aware of what cover they need and to tell them to inform their insurers, not to hold their policies. We give that advice at recruitment and repeat it at every annual visit, where the homestay confirms that cover remains in place and that their insurers have been informed. The Gas Safety Certificate is unaffected: Standard 5.10.2.3 requires an annual check and a copy provided to us, so we continue to collect and monitor it, and it covers gas central heating as well as other gas appliances. Paragraph 10.1 now also records that we do not collect written confirmation that the policies have been read, because AEGIS requires the policies to be shared and findable rather than confirmed, and states where the pack is published. The remainder of this section records the changes made in version 3.0.

Version 3.0 is a substantial revision. It implements the changes introduced by KCSIE 2026, which came into force on 1 September 2026. The principal changes are:

Change	Where
Harmful sexual behaviour introduced as a defined concept, with the developmental continuum and the link to misogyny	Part 4
"Making or sharing nudes and semi-nudes" adopted in place of "sexting", extended to digitally altered and AI-generated images	Part 4
Discriminatory and prejudice-based abuse recognised as a category of child-on-child abuse in its own right	Part 4
Self-harm, suicidal ideation and suicide risk recognised as standalone safeguarding concerns	Part 5
Expanded list of barriers for children with SEND	Part 6
New section on gender-questioning children	Part 7
Regulated activity updated for removal of the supervision exemption under the Crime and Policing Act 2026	Part 9
Annex A reading route removed. All staff, volunteers and homestays now read KCSIE Part one in full	Part 10
Information sharing updated, including transfer of information when a student changes school	Part 12
Generative AI, misinformation, disinformation and conspiracy theories added to online safety	Part 14
Annual filtering and monitoring review introduced, with named ownership	Part 14
Abuse indicators expanded, including child-to-parent abuse and emotional abuse through verbal abuse and persistent criticism	Appendix D

Change	Where
Peer on Peer Abuse Procedure V0.1 withdrawn, its content absorbed into Part 4	Part 4

Part 2 Safeguarding and child protection arrangements

2.1 BOSSS UK acknowledges its duty of care to safeguard and promote the welfare of all children in its care, to comply with UK child protection law and to adhere to the UN Convention on the Rights of the Child 1989. We are committed to protecting the children in our care from physical, emotional or sexual abuse, neglect and all other forms of harm.

2.2 We promote good practice by:

- providing students with appropriate safety and protection while in our care;
- ensuring that all staff, volunteers and homestays are informed of and aware of their responsibility to act on any concern or sign of abuse, neglect or other safeguarding issue by contacting the Designated Safeguarding Lead without delay;
- ensuring that all staff, volunteers and homestays are recruited in accordance with safe recruitment practice and are formally screened through an Enhanced Disclosure and Barring Service check with children's barred list information;
- promoting an environment of trust and open communication between students, schools, BOSSS UK personnel and homestays, so that student safety and pastoral care is the top priority;
- promoting an inclusive, anti-discriminatory culture in which prejudice-based harm is recognised as a safeguarding matter and is challenged; and
- responding to any allegation or suspicion of abuse in accordance with AEGIS requirements and local multi-agency procedures.

2.3 Designated Safeguarding Lead and Prevent Lead

The Designated Safeguarding Lead, referred to as the DSL, has lead responsibility for safeguarding and child protection. The DSL:

- acts as the first point of contact for homestays, parents, agents, students, partner schools and BOSSS UK staff;
- liaises as necessary with the relevant Local Authority Designated Officer and with the designated safeguarding lead at the school or college the student attends;
- acts as the first point of contact where a child may be vulnerable to radicalisation, in the DSL's capacity as Prevent Lead; and
- ensures that child protection records are accurate, up to date and stored securely.

The Deputy DSL acts with the full authority of the DSL in the DSL's absence.

2.4 Contact details

Role	Name	Contact number (24 hour)	Email
Designated Safeguarding Lead and Prevent Lead	Tina Wong	+44 (0)7776 206352	info@bosssguardians.com
Deputy Designated Safeguarding Lead and Deputy Prevent Lead	Eva (Haiwa) Qui	+44 (0)7922 152628	info@bosssguardians.com

Cover arrangements. KCSIE 2026 requires cover arrangements that are clear, reliable and known. Safeguarding concerns are sent to the shared confidential mailbox info@bosssguardians.com, which both the DSL and the Deputy DSL monitor, and to the 24 hour numbers above. If neither can be reached, contact the Compliance Director, Victoria Barfoot-Saunt, on +44 (0)7767 201388. A concern must never be held back because the DSL cannot immediately be reached.

If a child is in immediate danger, dial 999. Do not wait to reach the DSL first. Tell the DSL as soon as you have done so.

2.5 Inclusive and anti-discriminatory culture

- 2.5.1** KCSIE 2026 requires an inclusive, anti-discriminatory culture as part of whole-organisation safeguarding. Our students are international, are living in a country that is not their own and are often the only student of their background in a homestay or year group. That makes them more exposed to prejudice-based harm and less likely to report it.
- 2.5.2** Racist, faith-based, disability-based, sex-based and other discriminatory behaviour, whether by a student, a member of staff, a volunteer, a homestay or a third party, is a safeguarding matter and must be reported to the DSL. It is not to be treated as a behaviour or cultural-difference issue and resolved informally.
- 2.5.3** Staff and homestays must not downplay discriminatory behaviour as banter, teasing or a language misunderstanding. Where behaviour of this kind is observed it must be challenged at the time, so far as it is safe to do so, and reported.

2.6 Liaison with the safeguarding partners

- 2.6.1** Safeguarding partners in each area are the local authority, the integrated care board and the chief officer of police. They plan and work together with relevant agencies to safeguard and promote the welfare of local children. The DSL and Deputy DSL liaise with the safeguarding partners and work with other agencies in line with Working Together to Safeguard Children.
- 2.6.2** BOSSS UK knows how to access local agency contacts, including referrals to Multi-Agency Safeguarding Hubs and local safeguarding children partnerships across the country, and how to access locally agreed inter-agency procedures.
- 2.6.3** KCSIE 2026 strengthens alignment with Working Together to Safeguard Children. All staff must understand the threshold criteria for a Family Help referral and for a section 47 enquiry in the

area where the student is placed, and the DSL must be able to explain which route has been used and why.

- 2.6.4** For non-emergency concerns, contact the relevant local authority children's services or MASH, or telephone 101. In an emergency, dial 999. Key contacts are set out at Appendix G.

2.7 Liaison with parents, agents and partner schools

- 2.7.1** BOSSS UK keeps in regular contact with each student's school in line with the requirements of the parents. Each partner school has a designated person with whom we liaise.
- 2.7.2** We keep in regular contact with parents and agents, and share information regarding the student when appropriate.
- 2.7.3** KCSIE 2026 at paragraph 60 expects that, where a concern is being managed internally, the DSL considers informing parents or carers, provided that doing so would not place the child at additional risk. The DSL records the decision either way and the reason for it.
- 2.7.4** In the event of an emergency, staff and homestays should consult our Emergency Plan, which is available on our website and is issued to all homestays.

Part 3 Recognising abuse and safeguarding concerns

- 3.1** All staff, volunteers and homestays must be able to recognise the indicators of abuse and neglect. Detailed guidance on the four categories of abuse, the expanded indicators introduced by KCSIE 2026 and what to do if you have a concern is at Appendix D. Additional specific safeguarding issues are at Appendix E. Staff must read both.
- 3.2** Abuse is 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 includes ill treatment that is not physical, as well as the impact of witnessing the ill treatment of 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.
- 3.3** KCSIE 2026 expands the indicators of abuse. In addition to the established categories, staff and homestays must be alert to:
- child-to-parent or child-to-caregiver abuse, which in our context means abuse directed by a student at a homestay carer or a member of their household;
 - emotional abuse expressed as verbal abuse and persistent criticism;
 - prejudice-based harm, including racism and faith-based discrimination;
 - child criminal exploitation and child sexual exploitation, which may amount to modern slavery and may require a referral to the National Referral Mechanism; and
 - self-harm, suicidal ideation and suicide risk, which are dealt with in Part 5.
- 3.4** Behaviours linked to drug taking, alcohol misuse, deliberately missing education and the making or sharing of nudes and semi-nudes can all be signs that a child is at risk.

- 3.5** A student may not feel ready, or know how, to tell someone that they are being abused, exploited or neglected, and may not recognise their experience as harmful. This must not prevent you from exercising professional curiosity and speaking to the DSL if you have a concern.

Report to the DSL the same day, and within 24 hours at the latest. If you are unsure whether something is a safeguarding concern, report it anyway. It is the DSL's job to decide, not yours. Never investigate a concern yourself.

Part 4 Child-on-child abuse, harmful sexual behaviour, nudes and semi-nudes

This Part replaces the BOSSS Peer on Peer Abuse Procedure V0.1, which is withdrawn with effect from the date of this policy. That document was drafted for a further education college, cited KCSIE 2021 and referred to roles and procedures that do not exist in a guardianship organisation. Its substance is incorporated here and updated to KCSIE 2026, where child-on-child abuse sits in Part Five.

4.1 All staff must assume it is happening

- 4.1.1** Children can and do abuse other children. This is referred to as child-on-child abuse. It can happen inside and outside school, in a homestay, in transit and online. All staff, volunteers and homestays must be clear about this policy and the important role they have in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
- 4.1.2** Even where there are no reports, that does not mean it is not happening. It may be that it is simply not being reported. Our students face particular barriers to reporting: they are living away from their families, they may worry about the consequences for their school place or visa, and they may be reporting in a second language.
- 4.1.3** It is essential that all staff and homestays challenge inappropriate behaviour between children. Downplaying behaviour by dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" leads to a culture of unacceptable behaviour and, at worst, to a culture that normalises abuse so that children accept it and do not come forward.

4.2 Forms of child-on-child abuse

Child-on-child abuse is most likely to include, but is not limited to:

- bullying, including cyberbullying, prejudice-based bullying and discriminatory bullying;
- discriminatory abuse, including racism, faith-targeted abuse and other prejudice-based incidents. KCSIE 2026 expressly includes this as a form of child-on-child abuse in its own right and it must be recorded and responded to as such;
- abuse in intimate personal relationships between children, sometimes called teenage relationship abuse;

- physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm, which may include an online element that facilitates, threatens or encourages physical abuse;
- 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 standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party;
- making or sharing nudes and semi-nudes, dealt with at 4.4 below;
- upskirting, which typically involves taking a picture under a person's clothing without their permission with the intention of viewing their genitals or buttocks, to obtain sexual gratification or to cause the victim humiliation, distress or alarm. Upskirting has been a criminal offence since April 2019 under the Voyeurism (Offences) Act 2019; and
- initiation or hazing type violence and rituals, which may include an online element.

4.3 Harmful sexual behaviour

- 4.3.1** KCSIE 2026 gives significantly greater prominence to harmful sexual behaviour, referred to as HSB, alongside sexual violence and sexual harassment. All staff, volunteers and homestays must understand the concept.
- 4.3.2** Children's sexual behaviours exist on a continuum. At one end is behaviour that is developmentally typical and appropriate to the child's age and stage. At the other end is behaviour that is harmful, abusive and potentially violent. HSB describes behaviour that sits beyond the developmentally expected range, whether it is directed at younger children, at peers, at adults or involves the child themselves.
- 4.3.3** HSB is important because it can escalate. Identifying it early and responding proportionately protects both the child displaying the behaviour and other children. A child displaying HSB may themselves have been harmed, and must be treated as a child who may need help and protection, not simply as a perpetrator.
- 4.3.4** We adopt the NSPCC guidance on harmful sexual behaviour. Staff and homestays are trained to recognise HSB and to report it to the DSL. The DSL will, where appropriate, seek advice from the local authority and may use a recognised assessment framework such as the Brook Sexual Behaviours Traffic Light Tool to inform, but not to replace, a professional judgement.

4.3.5 Misogyny

KCSIE 2026 draws an explicit link between misogyny and harmful sexual behaviour and asks that misogyny be recognised early because of its escalatory nature. Staff and homestays must therefore treat misogynistic language, attitudes and online content as a potential precursor to HSB rather than as an unpleasant but self-contained attitude. This includes:

- degrading or dehumanising language about women and girls;
- consumption of, or repetition of material from, online influencers who promote misogynistic views;
- expressed beliefs about male entitlement to women's attention, bodies or compliance; and

- coercive or controlling behaviour towards female peers.

These must be reported to the DSL. The response will normally be educative in the first instance, but the concern must be recorded so that a pattern can be seen.

4.4 Making or sharing nudes and semi-nudes

- 4.4.1** KCSIE 2026 replaces the previous wording, being "consensual and non-consensual sharing of nude and semi-nude images", with "making or sharing nudes and semi-nudes". The term "sexting" is no longer used in this policy.
- 4.4.2** The definition expressly includes images that have been digitally altered and images generated by artificial intelligence. A nude or semi-nude image of a child that has been created by an AI tool, or created by editing a clothed photograph, is treated in exactly the same way as a photograph. Our students are among the most likely group to encounter this, because they share photographs with family overseas and across multiple platforms.
- 4.4.3** Creating and sharing nude or semi-nude images and videos of anyone under 18, including images a child has made of themselves, is illegal.

Every incident of sharing nudes and semi-nudes is a safeguarding concern. KCSIE 2026 is explicit on this point. It is reported to the DSL and handled under this policy. It is not handled as a behaviour matter under the Student Behaviour Policy alone, and it is never dealt with informally by a homestay.

4.4.4 Staff, volunteers and homestays must not:

- view, copy, forward or save the image, except where this is unavoidable and has been authorised by the DSL;
- ask the child to show them the image; or
- delete the image or ask the child to delete it before the DSL has taken advice, because it may be evidence.

- 4.4.5** They must report to the DSL immediately, record what they were told in the child's own words, and secure the device if it is safe and practicable to do so. The DSL will follow the UKCIS guidance on sharing nudes and semi-nudes and will decide whether a referral to children's social care or the police is required.

4.5 Responding to a report of child-on-child abuse

- 4.5.1** The initial response to a report is critical. All victims must be reassured that they are being taken seriously, that they will be supported and that they will be kept safe. A victim must never be given the impression that they are creating a problem by reporting, and must never be made to feel ashamed for making a report. We have a zero tolerance approach to sexual violence and sexual harassment.
- 4.5.2** Individuals raising a concern about child-on-child abuse must not be promised confidentiality, because it is very likely to be in the best interests of the children involved to seek advice from others.
- 4.5.3** Any response must:

- include a thorough consideration of the concern and the wider context in which it occurred. Depending on the nature and seriousness of the alleged incident it may be appropriate for children's social care or the police to carry out any investigation, and we will not investigate in parallel;
- treat all children involved as being at potential risk, and be alert to the possibility of other victims who have not yet been identified. A safeguarding response must be in place for both the alleged victim and the alleged perpetrator, who may have considerable unmet needs and be at risk of harm themselves;
- take account of the possibility of wider safeguarding concerns, of any discriminatory aspect to the incident, of any protected characteristic that may create particular vulnerability, and of the interplay between power, choice and consent. Where children appear to be making choices but those choices are limited, they are not consenting; and
- take account of the views of the children affected. Unless it is unsafe to do so, the DSL will discuss proposed action with the children and their parents and will seek consent to a referral before it is made.

4.5.4 Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

4.6 Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of activity but not another. Consent can be withdrawn at any time during sexual activity and each time activity occurs. In addition:

- a child under 13 can never consent to any sexual activity;
- the age of consent is 16; and
- sexual intercourse without consent is rape.

Rape, assault by penetration and sexual assault are crimes. Where such a report is made it will be referred to the police. The age of criminal responsibility is ten, but where the alleged perpetrator is under ten the starting principle of referring to the police still applies; the police will take a welfare rather than a criminal justice approach.

Part 5 Mental health, self-harm and suicide risk

This is a new Part. KCSIE 2026 lists self-harm, suicidal ideation and suicide risk as standalone safeguarding concerns, rather than only as possible indicators of other abuse. This change matters particularly for a guardianship organisation, because we see students at exets, half terms and holidays, away from school pastoral staff, and the homestay carer is often the adult best placed to notice a change first.

5.1 Mental health difficulty can, in some cases, be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation. It can also be a safeguarding concern in its own right. Both routes must be considered.

- 5.2** Only appropriately trained professionals may attempt to diagnose a mental health condition. Staff and homestays are not being asked to diagnose. They are being asked to notice, to report and not to manage it alone.
- 5.3** Self-harm, suicidal ideation and suicide risk are safeguarding concerns and must be reported to the DSL immediately and on the same day. This applies whether the student has said something directly, whether a homestay has seen physical signs, or whether the concern comes from another student.

5.4 Warning signs

KCSIE 2026 identifies warning signs including:

- marked change in behaviour, mood or engagement;
- sleep difficulty, including not sleeping, sleeping excessively or a disrupted pattern;
- social withdrawal and isolation from peers, homestay family or family at home;
- loss of appetite or concentration, or a significant change in eating;
- giving away possessions, or writing or drawing about death or hopelessness;
- unexplained injuries, particularly to the forearms, thighs or abdomen, or covering up in warm weather; and
- expressions of worthlessness, of being a burden, or that others would be better off without them.

- 5.5** Homesickness is common and is not in itself a safeguarding concern. Our Homesickness Guide, issued to parents and homestays, sets out the normal picture and how to support a student through it. However, where homesickness is accompanied by any of the signs at 5.4, or persists and deepens, it must be escalated to the DSL rather than managed as homesickness.

5.6 What staff and homestays must do

Do	Do not
Stay calm and listen	Promise to keep it secret
Take what the student says seriously	Tell the student they are being dramatic or ungrateful
Report to the DSL the same day	Wait to see whether it passes
Record the student's own words, dated and timed	Attempt to counsel or treat the student
Remove immediate means of harm if it is safe to do so	Search the student or their room without DSL authority
Dial 999 if there is immediate risk to life	Leave a student you believe to be at immediate risk alone

Never suggest that a student cope with distress by using physical discomfort or pain. Techniques of that kind, such as holding ice or snapping a band on the wrist, reinforce self-destructive behaviour. Report to the DSL and let a trained professional advise.

- 5.7** The DSL will consider whether to contact the school, the parents, the student's GP, NHS 111 or emergency services, and whether a referral to children's social care is required. The DSL will record the decision and the reasoning. Where a student is under the care of a mental health professional, the DSL will agree with the school and parents who holds which responsibility during guardianship periods, and will record that agreement in the student care plan.
- 5.8** Support organisations are listed at Appendix G. The DSL verifies annually that each organisation listed is still operating and that its contact details are current.

Part 6 Students with SEND and additional needs

- 6.1** Children with special educational needs and disabilities, referred to as SEND, can face additional safeguarding challenges. KCSIE 2026 expands the list of additional barriers that can exist when recognising abuse and neglect in this group. These barriers include:
- assumptions that indicators of possible abuse, such as behaviour, mood or injury, relate to the child's disability, without further exploration;
 - the child may not recognise their own experience as abusive;
 - the child may need intimate care, which creates both additional risk and additional opportunity for concealment;
 - the child may be isolated from peers and social networks, and so have fewer people to tell;
 - the child may be dependent on the adults caring for them, which makes reporting a concern about that adult very difficult;
 - children with SEND may be disproportionately affected by behaviour such as bullying without outwardly showing any sign; and
 - communication barriers, and difficulties in overcoming those barriers.
- 6.2** The dependency barrier is particularly important in a guardianship context. The homestay carer providing intimate or close personal support may also be the person a concern would be about. Where a student requires intimate care, this must be set out in the student care plan, agreed with parents and the school, and reviewed at each annual homestay visit.
- 6.3** To address these challenges we engage the school to consider extra pastoral support, and we take particular care in matching the student to a homestay with the capability to support them. Where a student has an education, health and care plan or equivalent overseas documentation, the DSL obtains it and shares the relevant parts with the homestay.
- 6.4** Our students communicate in a second language and may also have additional needs. Language difficulty must never be mistaken for lack of capacity, and additional need must never be assumed from limited English. Where necessary the DSL arranges interpretation from someone independent of the concern, and never asks another student to interpret a safeguarding disclosure.

6.5 Medical conditions and medication

KCSIE 2026 at paragraph 252 clarifies that the management of a medical condition does not of itself warrant a safeguarding referral. However, a pattern such as repeated omission of prescribed medication, repeated failure to attend medical appointments, or repeated failure to obtain treatment may indicate neglect or abuse and must be reported to the DSL. Homestays record medication administration and appointment attendance, and report any pattern of omission. Further detail is in the Welfare, Health and Safety Statement.

Part 7 Gender-questioning children

This is a new Part, and it requires legal review before issue. KCSIE 2026 carries substantive content on gender-questioning children at paragraphs 254 to 284, reflecting implementation of the related statutory guidance. This Part is drafted to reflect that guidance as it stands. This is a contested area of law and guidance that has been subject to challenge and revision, and the position may change. BOSSS UK will provide each school to confirm our approach with each partner school.

7.1 A guardianship organisation is not a school, but this Part is directly relevant to our operations. We make homestay placement and room-sharing decisions, we accompany students to medical appointments, and we communicate with overseas parents on the student's behalf. A student may raise this with a student coordinator or a homestay during an exeat or holiday, when the school is not available.

7.2 Our position

7.2.1 BOSSS UK will not initiate any action in relation to a student's gender. We respond when a request is raised with us by the student or by their parent. We do not encourage, suggest or facilitate social transition, and we do not treat a student as having changed gender on our records or in our arrangements on our own initiative.

7.2.2 Where a request is raised with any member of staff, volunteer or homestay, it must be referred to the DSL the same day. The person receiving the request should listen, should not make any commitment, and should not agree or refuse anything in the moment.

7.2.3 The student attends a school, and the school holds the primary relationship and the statutory duty. Our role is to align with the approach the school is taking, not to set a different one. The DSL will contact the school's designated safeguarding lead before any decision is taken, and will record the school's position.

7.3 Parental involvement

7.3.1 Parents and carers should be involved as a matter of priority, and their views carry great weight. This is the default position and it is consistent with our role as educational guardian acting in loco parentis, not in place of the parent's authority.

7.3.2 There will be rare circumstances in which involving parents would place the student at risk of significant harm. In those circumstances the DSL must be involved, must consider whether the threshold for a safeguarding referral is met, and must take advice from the local authority before deciding not to involve parents. That decision, and the reasons for it, must be recorded.

7.3.3 Our parent body is largely overseas and the family context, legal position and cultural expectations in the student's home country may differ substantially from those in the United Kingdom. The DSL will take this into account when considering how, not whether, to involve parents, and will seek advice where the position is unclear.

7.4 Single-sex provision and homestay arrangements

7.4.1 KCSIE 2026 provides that single-sex facilities such as toilets and changing rooms are provided on the basis of biological sex, and that schools must not permit access to facilities designated for the opposite sex. Alternative arrangements, such as single-use facilities, may be offered alongside single-sex provision without compromising it. In relation to sport, where there are safety concerns there must be no exceptions to single-sex provision.

7.4.2 Applied to our operations, this means:

- shared bedrooms in a homestay are allocated on the basis of biological sex. Where a request is made that would result in a shared room with a student of the opposite biological sex, it will not be agreed;
- where a student is uncomfortable with shared facilities, the DSL will consider a homestay placement offering sole use of a bathroom, or a single room, as an alternative arrangement. This is a practical accommodation and does not alter the basis on which shared facilities are allocated; and
- the homestay carer is informed of what they need to know to care for the student safely, and no more. Information about a student's gender is not shared with a homestay, a driver or another student as a matter of course.

7.4.3 Any decision taken under this Part is recorded by the DSL, with the date, who was consulted, what the school's position was, what the parents' views were and what was decided. Records are held in accordance with the Data Retention Policy. Information about a student's gender is special category personal data and is handled accordingly.

7.4.4 Nothing in this Part displaces our duties under Part 1 and Part 2. A gender-questioning student is entitled to the same protection from bullying, harassment and prejudice-based harm as any other student, and any such behaviour towards them is a safeguarding matter.

Part 8 Missing students and children missing education

8.1 A missing child could potentially be at risk of abuse or neglect. We are alert to that possibility and will notify all relevant authorities if it is deemed necessary. This Part is provided to all staff and homestays and appears in our Homestay, Parent and Student Handbooks and on our website.

8.2 Minimising the risk

To minimise the risk of a student becoming lost, the homestay or school will:

- ensure the student has all relevant contact numbers, including the homestay and primary carer, their BOSSS UK student coordinator, the DSL and the 24 hour emergency numbers;
- ensure the premises are secure and take steps to prevent unauthorised persons entering;

- ensure the student is supervised appropriately to their age and stage of development when public places such as parks, museums and shops are visited;
- agree a meeting point on arrival at any venue in case of separation;
- teach the student how to keep safe, what to do if they become separated and the dangers of wandering off; and
- with parental consent, carry an up-to-date photograph of each student in their care.

8.3 Suggested timeline

The following is a guideline rather than a strict protocol. Timings will vary in each case, and where there has been a delay in the absence being discovered the timescale must be tightened accordingly.

Elapsed time	Action
0 minutes	Indicated return time passes, for example the agreed time to return for a meal.
0 to 1 hour	Late return noted by staff or homestay. Try to establish the student's whereabouts by mobile phone and, if unsuccessful, by speaking to their friends where known.
1 to 2 hours	Not returned. If still unable to make contact, the homestay or staff member contacts the DSL, checks for any planned trip and conducts a basic room search for evidence of the reason for absence. A phone call must be made if there is any concern for the student's welfare.
On discovery	Search the surrounding area immediately, request help from people nearby, alert staff if in a public building, request that exits be sealed and CCTV accessed where possible, provide a description of the student and what they are wearing, and reassure any other students present.
If unsuccessful	Telephone the police, providing a description, and keep searching. You do not have to wait 24 hours to report someone missing. Contact the DSL or Deputy DSL within 2 hours. The DSL advises the parents and the school.

8.4 Children missing education

- 8.4.1** All staff must be aware that children going absent or missing, particularly repeatedly, can be a vital warning sign of a range of safeguarding possibilities. These include abuse and neglect, sexual abuse or exploitation, child criminal exploitation, mental health difficulty, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation and risk of forced marriage.
- 8.4.2** Working Together to Improve School Attendance is statutory guidance for governing bodies and proprietors. BOSSS UK is neither, but our students' schools are working to it, so our escalation is framed to support theirs.
- 8.4.3** Homestays and staff must report any unexplained absence or pattern of non-attendance to the DSL immediately. The DSL will ensure concerns are escalated to the relevant school and local authority without delay. All absences are recorded, monitored and followed up promptly.
- 8.4.4** KCSIE 2026 widens the groups of children for whom early help should be considered. Of these, the groups relevant to our students are those on part-time timetables, those repeatedly removed from the classroom and those showing early signs of harmful behaviour. Where a school notifies

us that a student falls into any of these groups, the DSL records it and considers what additional support is needed during guardianship periods.

8.5 Recording

The Missing Student log records the date of the incident, the student's name, incident detail, action undertaken, the staff member who reviewed the incident, lessons learnt and any action taken such as required policy updates and communications. The log is held electronically on our secure cloud drive, accessible only by approved members of staff and in line with data protection requirements. A review is undertaken after every incident and any lessons learnt are incorporated into this policy.

Part 9 Safer recruitment and regulated activity

- 9.1** BOSSS UK is committed to ensuring that all recruitment policy and procedure is safe, promotes the welfare of children and meets the requirements of KCSIE Part three. The aim is to identify and reject applicants who could cause harm to a child in our care or who are unsuited to working with children.

Important change from 1 September 2026. The Crime and Policing Act 2026 removed the supervision exemption from the definition of regulated activity. Until 31 August 2026, an unpaid volunteer who was directly supervised by a person in regulated activity fell outside regulated activity. That exemption no longer exists. Supervision is no longer a basis on which anyone can be treated as outside regulated activity.

9.2 Regulated activity

- 9.2.1** Teaching, training, instructing, caring for or supervising children is regulated activity where it is carried out frequently. The frequency conditions are:
- on more than three days in any period of 30 days; or
 - overnight, meaning between 2am and 6am with an opportunity for face to face contact. Overnight activity meets the condition on its own, even if it happens once.
- 9.2.2** Anyone in regulated activity with children must have an Enhanced DBS check with children's barred list information. Checks are free for volunteers. It is a criminal offence for a barred person to engage in regulated activity, and an offence for us to knowingly permit it.
- 9.2.3** The practical effect for BOSSS UK is set out below. The DSL and Compliance Director reviewed each category against the new rules in September 2026.

Who	Regulated activity?	Check required
BOSSS UK staff	Yes	Enhanced DBS with children's barred list
Homestay primary carer	Yes	Enhanced DBS with children's barred list

Who	Regulated activity?	Check required
All members of the homestay household aged 16 and over	Yes, by reason of overnight care	Enhanced DBS with children's barred list
Contracted drivers undertaking transfers	Yes where the frequency condition is met, and supervision is no longer relevant	Enhanced DBS with children's barred list
Volunteers of any kind	Yes where a frequency condition is met, regardless of supervision	Enhanced DBS with children's barred list, free of charge
Volunteers not in regulated activity	No	Consider Enhanced DBS without barred list, or Basic DBS, on a risk-assessed basis

Note on our standard. BOSSS UK requires Enhanced DBS with barred list checks on all homestay household members aged 16 and over. This is a higher standard than the minimum and it is deliberate, because our students live in the household overnight.

9.2.4 Where a young person aged 16 or 17 lives in a homestay household, they can obtain a DBS check. Children under 16 cannot. Where a household includes a child under 16, that is taken into account in the homestay risk assessment rather than addressed by a check.

9.2.5 Existing volunteers and drivers in regulated activity who did not previously hold an Enhanced DBS with barred list check, because they were supervised, must be checked. Pending receipt of the certificate, the Compliance Director will risk assess and record whether the individual may continue, and on what conditions.

9.3 Checks we carry out

As part of recruiting all staff, volunteers and homestays we will:

- treat all applicants fairly and recruit on the knowledge, skills and experience needed for the role. The job description will state that the role involves working with children, or working in a setting where children are present, and will state the safeguarding responsibility;
- carry out identification and verification checks. Where possible, best practice is to check the name on the birth certificate, being alert to the possibility of a change of name;
- complete a Right to Work check;
- obtain an Enhanced DBS check with children's barred list information as set out at 9.2;
- carry out online searches on all shortlisted candidates as part of safer recruitment. These use publicly available information to help identify safeguarding risk and are considered alongside other pre-employment checks. Where negative information is identified it is retained and stored in accordance with our Data Protection and Privacy Policy and our Data Retention Policy;
- obtain two references, one professional and one personal, from people who have known the applicant for over two years and who are not family members;

- verify the source of each reference by telephone, request proof of identity from the personal referee, and log the call. References are checked for consistency with the application and any discrepancy is taken up with the candidate. Where a reference raises a concern, the referee is telephoned so further questions can be asked; and
- apply the same checks to individuals who have lived or worked outside the United Kingdom, including criminal records checks for overseas applicants using Home Office guidance and, where relevant, a letter of professional standing from the professional regulator in the country concerned.

For homestays we additionally:

- conduct a homestay interview and assessment at the household to assess suitability and inspect all accommodation, with detailed notes retained;
- obtain a signed Homestay Self Declaration;
- obtain a Gas Safety Certificate;
- advise the homestay of the insurance requirements set out at 9.5; and
- obtain written permission from staff and homestays for the above checks to be undertaken.

All safer recruitment records are held electronically on our secure cloud drive, accessible only by approved members of staff and in line with data protection requirements. Retention periods are set out in the Data Retention Policy. In particular, a copy of a DBS certificate must not be retained beyond six months from issue.

9.4 BOSSS UK does not have any private fostering arrangements.

9.5 Insurance: what we advise

9.5.1 AEGIS Standard 2.4.2 requires us to have a process for checking that all homestays are aware of the need to ascertain the adequacy of their home insurance in respect of hosting international students, and to inform them that the homeowner should declare all facts to their insurer in order to obtain the right cover and the right premium.

9.5.2 AEGIS Standard 2.4.3 requires us, where a homestay transports students in their own vehicle, to make them aware of the need for adequate comprehensive vehicle insurance and of the need to inform their insurer that the vehicle will be used to transport international students, for which they may be paid or receive expenses. The Staff and Homestay Code of Conduct 8.9, paragraph 12.1, requires anyone transporting students to hold appropriate cover.

9.5.3 We give this advice in writing at recruitment, and the homestay confirms that they have read and understood it. The advice is set out in the Homestay Handbook and the Homestay Agreement, and the confirmation is recorded on the Homestay Interview and Assessment form.

9.5.4 We repeat the advice at every annual visit. At that visit the primary carer confirms that home insurance remains in place, that their insurer has been informed that they host international students, and whether anything has changed about transporting students. Where they do transport students, they confirm that comprehensive cover including the carriage of students is in place and that their insurer has been told. These confirmations are recorded on the annual visit record, which forms part of the annual declaration.

9.5.5 We do not collect or hold home or vehicle insurance documentation. The obligation under Standards 2.4.2 and 2.4.3 is to make the homestay aware of what they need, and responsibility

for holding adequate cover rests with the homestay. Our record is the advice given at recruitment and the confirmations recorded at each annual visit.

- 9.5.6** Where a homestay tells us that they have started or stopped transporting students, or that cover has lapsed, this is recorded on the Homestay File and on the homestay compliance tracker, and the Compliance Director considers whether any placement needs to be reviewed.

Part 10 Safeguarding training

Change from 1 September 2026. KCSIE 2026 removed Annex A, which was the shortened version of Part one. There is no longer a reduced reading route for staff who do not work directly with children. All staff, volunteers and homestays must read KCSIE Part one in full. A separate "Part one: overview for all staff" document is published as a quick reference, but it does not replace reading Part one.

- 10.1** All staff, volunteers and homestays read this policy at induction and at each annual review, or sooner if it is updated. They are also issued with the Staff and Homestay Code of Conduct. The current policy pack is published at <https://www.bosssguardians.com/> and the Homestay Handbook says where to find it. We do not collect written confirmation that the policies have been read. The AEGIS Quality Standards require the policies to be shared with staff and homestays and to be findable, at Standards 6.4.1, 6.9.1 and 6.10.1 and Appendix 3, not that reading is confirmed in writing. Homestays are reminded to read the current policies at every annual visit, and that reminder is recorded on the annual visit record.
- 10.3** We provide mandatory safeguarding training to all staff, volunteers and homestays annually. This includes training and guidance on the AEGIS Basic Homestay Check-List, referred to as CL1, which confirms the duties and responsibilities of the guardianship organisation and the homestay family. See Appendix B.
- 10.4** The DSL and Deputy DSL must attend suitable live training, delivered either face to face or live remotely, provided or approved by the Local Safeguarding Partnership, AEGIS or the NSPCC. Pre-recorded or self-paced e-learning is not acceptable for the DSL or Deputy DSL role. This training must be renewed at least every two years.
- 10.5** At least one member of BOSSS UK staff has received safer recruitment training from a recognised provider.
- 10.6** Training for staff and homestays covers, as a minimum: the four categories of abuse and the expanded indicators at Appendix D; child-on-child abuse and harmful sexual behaviour; making or sharing nudes and semi-nudes, including AI-generated images; self-harm and suicide risk; prejudice-based harm; online safety including generative AI; and how and when to report to the DSL.

Part 11 Whistleblowing and low-level concerns

11.1 Whistleblowing

- 11.1.1** BOSSS UK is committed to being open, honest and accountable to the highest standard. The Public Interest Disclosure Act 1998 protects employees against being dismissed or treated unfairly by their employer where they have made a protected disclosure.
- 11.1.2** The whistleblowing policy assists, encourages and supports individuals who wish to report serious concerns, including: safeguarding or child protection wrongdoing; a criminal offence; health and safety; risk of or actual damage to the environment; a miscarriage of justice; the company breaking the law; and the covering up of any wrongdoing.
- 11.1.3** A disclosure may be made to any member of staff, who must escalate it urgently and without delay to the DSL or Deputy DSL.
- 11.1.4** If your concern relates to a safeguarding or child protection wrongdoing, you should normally first raise it internally with the DSL or Deputy DSL. If you feel unable to do so because your concern relates to them, raise it with the Managing Director without bringing it to the attention of the DSL. If your concern is about senior leadership, bring it to the attention of the Local Authority Designated Officer. Contacts are at Appendix G.
- 11.1.5** Where a concern relates to suspected criminal activity, the DSL will inform the police and will facilitate the police investigation appropriately.
- 11.1.6** If you are worried at any stage about how to raise a concern, seek independent advice at the earliest opportunity, through your union or professional body, or through the independent whistleblowing charity Protect. Anything you say to a legal adviser is automatically protected.
- 11.1.7** The NSPCC operates a whistleblowing advice line for staff who do not feel able to raise concerns about child protection failures within their organisation. Contacts are at Appendix G.
- 11.1.8** If you have raised a concern internally but feel it has not been properly addressed, you may raise it outside your place of work, ordinarily first with a body that has oversight of your employer, such as AEGIS, the local authority or a national regulator. If your concern is about an immediate or current risk to a child, follow the local authority child protection procedures.

11.1.9 Investigating procedure

- The DSL or their delegate obtains and documents full details of the concern in writing, provides it to the person making the report and retains it as evidence.
- If the concern is a safeguarding or child protection issue, the DSL must not investigate in any way, but must inform the Local Authority Designated Officer and follow their instructions. Only the police and the Designated Officer can investigate a child protection case.
- Where appropriate, the person against whom the complaint has been made is informed of it and of their right to be accompanied by an appropriate representative at any interview or hearing.
- The investigation and the rationale for the decision are documented in a written report.
- If appropriate, a disciplinary process is initiated and company procedure followed.
- The person who raised the concern is kept informed of progress and of the final decision where appropriate, taking account of the confidentiality of others.
- If the person is not satisfied with how the concern was dealt with, they may raise it with a more senior member of staff or with a prescribed person or body.

11.2 Low-level concerns

- 11.2.1** The aim of the low-level concerns policy is to create a culture in which all concerns about adults, including allegations that do not meet the harm threshold, are shared responsibly with the right person, recorded and dealt with appropriately. This encourages an open and transparent culture, enables early identification of concerning, problematic or inappropriate behaviour, minimises the risk of abuse and ensures that adults working on our behalf are clear about professional boundaries.
- 11.2.2** A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a nagging doubt, that an adult may have acted in a way that is inconsistent with the Staff and Homestay Code of Conduct, including inappropriate conduct outside work, and that does not meet the allegation threshold.
- 11.2.3** The term low-level does not mean insignificant. It means that the behaviour does not meet the harm threshold set out at Part 15.
- 11.2.4** Low-level concerns must be shared with the DSL or Deputy DSL as soon as reasonably possible and in any event within 24 hours of becoming aware of the matter where it relates to a particular incident. It is never too late to share a low-level concern. Where the concern has been shared with the DSL, the DSL will inform the Managing Director as soon as practicable.
- 11.2.5** If a low-level concern relates to the behaviour of the DSL or Deputy DSL, it should be referred to the Managing Director or the Compliance Director, unless there is a conflict of interest in doing so, in which case it should be reported directly to the Local Authority Designated Officer.
- 11.2.6** A concern may be shared verbally or in writing. Where it is shared verbally, the DSL or Deputy DSL will make an appropriate record of the conversation, either at the time or immediately afterwards.
- 11.2.7** On receiving a low-level concern the DSL or Deputy DSL will, in an appropriate sequence for the particular concern: speak to the person who raised it, unless it was raised anonymously; speak to any potential witnesses, unless advised not to by the Designated Officer or another external agency; speak to the individual about whom the concern has been raised, subject to the same qualification; and seek advice from the Designated Officer if in any doubt, on a no-names basis if necessary.
- 11.2.8** The DSL will then determine whether the behaviour: is entirely consistent with the Code of Conduct and the law; constitutes a low-level concern; is not serious enough to consider a referral but may merit seeking advice; or, when considered with any other low-level concerns previously raised about the same person, now meets the threshold of an allegation and must be referred.
- 11.2.9** Detailed records are kept of all internal and external conversations, the determination, the rationale and any action taken. Records are retained in accordance with the Data Retention Policy. The pattern is the point: a single low-level concern may be trivial, while three about the same person may not be.
- 11.2.10** Any investigation of a low-level concern is conducted discreetly and on a need-to-know basis, and responds proportionately, maintaining confidence that such concerns will be handled effectively while protecting individuals from false allegation or misunderstanding. Many low-level concerns will be resolved by a conversation with the individual, being clear about why the behaviour is concerning, what change is required, what support might help and what the consequences are of failing to reach the required standard.

Part 12 Confidentiality, information sharing and data protection

12.1 Confidentiality

- 12.1.1** Information sharing is essential for effective safeguarding. It is a factor identified in many serious case reviews, where poor information sharing resulted in missed opportunities to take action to keep children safe.
- 12.1.2** Where information is shared with the consent of the individuals involved, and they are clearly informed of the purpose, there is no breach of confidentiality or of the Human Rights Act 1998. Where information is confidential and consent has not been obtained, practitioners must decide whether there are grounds to share without consent, because it is overwhelmingly in the individual's interests, because a public interest justifies disclosure, or because sharing is required by a court order, other legal obligation or statutory exemption.
- 12.1.3** Where a child's welfare is paramount, the common law duty of confidence can be overcome. This must be considered case by case. Initial thought must be given to whether the objective can be achieved by limiting the amount of information shared.
- 12.1.4** Child protection and safeguarding records are confidential and disclosure is allowed only to those who need the information in order to safeguard and promote the welfare of children. The DSL is responsible for ensuring that child protection files are kept up to date, confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records must include a clear and comprehensive summary of the concern, details of how it was followed up and resolved, and a note of any action taken, decisions reached and the outcome.
- 12.1.5** BOSSS UK will co-operate with the police and children's social care in order to share relevant information related to child protection enquiries under section 47 of the Children Act 1989.

12.2 The duty to share

- 12.2.1** KCSIE 2026 strengthens the expectation that information relevant to safeguarding or promoting the welfare of a child is shared, governed by relevance, necessity and proportionality. Fear of sharing information must never be allowed to stand in the way of safeguarding a child. The Data Protection Act 2018 and the UK GDPR do not prevent the sharing of information for the purposes of keeping children safe.
- 12.2.2** The seven golden rules for sharing information apply:
- the Data Protection Act 2018 and the UK GDPR, and human rights law, are not barriers to justified information sharing, but provide a framework to ensure that personal information is shared appropriately;
 - be open and honest with the individual, and their family where appropriate, from the outset about why, what, how and with whom information will or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so;
 - seek advice from other practitioners if in any doubt, without disclosing the identity of the individual where possible;
 - share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent. You may still share without consent where, in your judgement, there is good reason to do so, such as where safety may be at risk;

- base information sharing decisions on the safety and wellbeing of the individual and others who may be affected;
- ensure that the information shared is necessary for the purpose, is shared only with those who need it, is accurate and up to date, is shared in a timely fashion and is shared securely; and
- keep a record of the decision and the reasons for it, whether the decision is to share or not to share. If you share, record what was shared, with whom and for what purpose.

12.2.3 Understanding that safeguarding of children and individuals at risk is a processing condition permitting the sharing of special category personal data, including without consent where there is good reason, is an essential part of the DSL role.

12.3 Transfer of information when a student changes school

12.3.1 This is a new provision. KCSIE 2026 expects the DSL to share information indicating that a pupil may pose a risk to themselves or to others with a receiving school, and recommends a direct conversation between designated safeguarding leads where the concern is significant. The receiving school is expected to risk assess and put a safety plan in place.

12.3.2 Students in our care change school more often than the general population, on transfer between schools, on progression from GCSE to sixth form and following exclusion. Where a student we support moves school, the DSL will:

- confirm that the outgoing school has transferred the child protection file to the receiving school, and record that confirmation;
- share with the receiving school's designated safeguarding lead any safeguarding information held by BOSSS UK that is relevant to the student's safety or welfare, including anything arising during guardianship periods that the school may not know;
- hold that conversation by telephone, and not by email alone, where the concern is significant; and
- record what was shared, with whom, when and why.

12.3.3 Where a student leaves our guardianship, safeguarding records are retained in accordance with the Data Retention Policy and are not deleted on departure.

12.4 Data protection

12.4.1 BOSSS UK staff have access to personal confidential information collected about homestays, students, overseas parents and other staff. This information is gathered to enable us to provide a guardianship service and associated functions, and there may be a legal requirement to collect and use information to ensure we comply with our statutory obligations.

12.4.2 BOSSS UK is registered with the Information Commissioner's Office under reference ZA139160. Information is stored and processed in accordance with the Data Protection Act 2018 and the UK GDPR. Our Data Controller is Tina Wong.

12.4.3 Everyone responsible for using data follows the data protection principles, so that information is processed lawfully, fairly and transparently; collected for specified, explicit and legitimate purposes; adequate, relevant and limited to what is necessary; accurate and kept up to date; kept no longer than necessary; and processed with appropriate security.

12.4.4 Full detail is in the Data Protection and Privacy Policy and the Data Retention Policy, which must be read alongside this policy.

12.5 Disclosing information to third parties

We may disclose personal information to third parties in the following circumstances:

- where we are legally required to disclose it;
- to assist fraud protection and minimise credit risk;
- where an applicant is applying as a homestay or staff member, to create a homestay or staff profile shared only with relevant parties in relation to hosting students;
- to undertake a DBS check as an essential part of our screening process; and
- to AEGIS head office and to lead and supporting inspectors as part of our accreditation process. We permit them to process data only for specified purposes and in accordance with the UK GDPR, and we share the minimum amount necessary.

12.6 Record keeping

12.6.1 BOSSS UK recognises that by efficiently managing its safeguarding records it complies with its legal and regulatory obligations and contributes to the effective overall management of the organisation. Records provide evidence for protecting the legal rights and interests of the organisation, our parents, students, staff, homestays and partner schools, and provide evidence for demonstrating performance and accountability.

12.6.2 This applies to all records created, received or maintained by staff in the course of their functions. Records may be created or received, dated and stored in hard copy at our registered office, or electronically on a secure cloud drive accessible only by BOSSS UK staff, in line with data protection requirements.

12.6.3 All concerns, discussions and decisions made, and the reasons for those decisions, must be recorded in writing. If in doubt about recording requirements, staff should discuss the matter with the DSL or Deputy DSL.

Part 13 Bullying, including cyberbullying

13.1 BOSSS UK is committed to safeguarding its students from bullying. We promote a caring, friendly and safe environment for all our students.

13.2 Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. It can take many forms, including cyberbullying by text message, social media or gaming, which can include the use of images and video. It is often motivated by prejudice against particular groups, for example on grounds of race, religion, sex, sexual orientation, special educational needs or disability. It may be motivated by actual or perceived differences.

13.3 Bullying is most commonly expressed as: emotional, being unfriendly, excluding or tormenting; physical, pushing, kicking, hitting or any use of violence; racist, racial taunts or gestures; sexual, unwanted physical contact or sexually abusive comments; verbal, name calling or teasing; and cyber, across all areas of the internet.

- 13.4** A student will often show signs that they are being bullied. The most obvious are: unwillingness to go to school; becoming withdrawn, anxious or lacking in confidence; beginning to do poorly at school; possessions damaged or going missing; unexplained cuts and bruises; becoming aggressive, disruptive or unreasonable; a change in eating habits or stopping eating; crying themselves to sleep or having nightmares; and being frightened to say what is wrong.
- 13.5** All incidents of bullying or suspected bullying must be reported immediately to the DSL or Deputy DSL. It is the DSL's responsibility to ensure the child is protected and safe. Attempts will be made to help the student who has bullied to change their behaviour. Actions may include an apology, reconciliation where appropriate, and in serious cases exclusion from our services. Each case is monitored after resolution to ensure there is no repetition.
- 13.6** Bullying can be a child protection issue and must be dealt with as such where the child is likely to suffer significant harm. Where bullying is motivated by a protected characteristic it is prejudice-based harm and Part 2.5 applies. Where it is sexual in nature, Part 4 applies.

13.7 Supporting a student who has been bullied or subjected to online abuse

- Reinforce that no one deserves to be treated in this way and that they have done nothing wrong.
- Ensure they know that help is available to them.
- Encourage them to talk to someone they trust, such as a teacher or a member of the homestay family, so they feel they have somewhere safe to go.
- Encourage them to talk to their parents or carers and, if that is not possible, to write to or speak to another family member.
- Take screenshots of any cyberbullying so there is evidence.
- Report abuse to the relevant platform using its reporting function.
- Give praise for being brave and talking things through.
- Where abuse sent by email or posted to a web board may amount to harassment, make a complaint to the police, who can trace IP addresses.
- Ask the school whether it has a school liaison police officer who can help.

Where a homestay or member of staff is concerned that a student may be at risk of self-harm or suicide, Part 5 applies and the matter must go to the DSL the same day. It must not be managed within the bullying process alone.

Please also refer to the Equality Act 2010, which sets the legal parameters for discrimination, and to the Department for Education advice Preventing and Tackling Bullying.

Part 14 Online safety

- 14.1** The purpose of this Part is to: educate homestays, parents, agents and students about online safety and appropriate behaviour so that they remain safe and legal online; help them develop the critical thinking to keep themselves safe; keep personal data secure; and minimise the risks of handling sensitive information.

14.2 Information technology and the internet are defined in this policy as all forms of computing, the internet, telecommunications, digital media, generative artificial intelligence tools and mobile devices. Electronic communication includes email, text, instant messaging, social networking, gaming and AI chatbots.

14.3 We welcome the development of new technologies and will use them where appropriate to enhance our work with young people. We recognise our responsibility to take all reasonable measures to ensure that the risks of harm to young people are minimised, and to take appropriate action where there are concerns.

14.4 The four categories of online risk

KCSIE organises online risk into four areas. KCSIE 2026 updates this framework to identify generative artificial intelligence as a risk factor in the contact and conduct categories.

Category	What it covers	Examples relevant to our students
Content	Being exposed to illegal, inappropriate or harmful material	Pornography, self-harm and suicide content, extremist material, and misinformation, disinformation including fake news, and conspiracy theories
Contact	Being subjected to harmful online interaction with other users	Grooming, adults posing as peers, and AI chatbots and companion applications that simulate relationships, encourage disclosure or give harmful advice
Conduct	Personal online behaviour that increases the likelihood of, or causes, harm	Making or sharing nudes and semi-nudes, including images that are digitally altered or generated using AI tools, online bullying and hate speech
Commerce	Risks such as online gambling, inappropriate advertising, phishing and financial scams	Gambling sites, in-game purchasing, phishing targeting international students and money-muling approaches

14.5 Misinformation, disinformation and conspiracy theories were added to the content category by KCSIE 2025. Exposure of this kind can contribute to radicalisation, and staff and homestays should read this alongside the Anti-Radicalisation and Prevent Duty Policy.

14.6 Generative artificial intelligence

14.6.1 We follow the Department for Education guidance on generative artificial intelligence in education. Generative AI presents specific risks to our students that staff and homestays must understand:

- AI chatbots and companion applications can simulate friendship and intimacy. A student who is homesick, isolated or living in a second language may confide in an AI tool in preference to an adult, and may receive advice that is wrong, harmful or that discourages them from seeking help. This is a contact risk;
- AI image tools can generate or alter images to create nude or semi-nude pictures of real children, including from an ordinary clothed photograph. This is a conduct risk and is dealt with at Part 4.4;

- AI tools can produce convincing misinformation and can be used to impersonate a trusted adult, a family member or a school, which creates both a content risk and a fraud risk; and
- personal and special category information entered into a public AI tool may leave our control. Staff must never enter a student's personal data, safeguarding information or medical information into a public AI tool.

14.6.2 Where a student discloses that an AI tool has encouraged self-harm, suicide, disordered eating or other harmful behaviour, this is a safeguarding concern and Part 5 applies.

14.7 Filtering and monitoring

New requirement. KCSIE 2026 at paragraph 173 requires a named senior leader to be responsible for reviewing filtering systems at least once every academic year, across all internet-connected devices, with records of the checks retained. The previous requirement was the looser "regularly".

14.7.1 A guardianship organisation does not operate a school network. The proportionate equivalent for BOSSS UK is the homestay network, and our arrangements are as follows.

Requirement	BOSSS UK arrangement
Named senior responsibility	Tina Wong, DSL supported by the Deputy DSL Eva (Haiwa) Qui
Frequency	At least once every academic year, for every active homestay
Mechanism	Filtering and monitoring check built into the existing annual homestay visit
Record	Recorded on the Homestay Interview and Assessment form and retained on the secure cloud drive
Scope	Home broadband and Wi-Fi parental controls, and the location in which students access the internet
Reporting	Annual summary to the Managing Director, with any homestay not meeting the standard identified and remediated

14.7.2 Homestays must ensure that students access the internet in safe, supervised environments. Home Wi-Fi should use parental controls or filtering to block harmful content, and online activity should take place in shared spaces where possible. Constant monitoring is not required, but adults must stay alert to risk and report any concern to the DSL immediately.

14.7.3 Where a homestay is unable or unwilling to implement filtering, the Compliance Director will risk assess the placement and may decline to place students there.

14.8 Acceptable use

14.8.1 Use of the internet, web-based or mobile communications and social media by staff must be appropriate to their role, lawful, proportionate and ethical. The use of illegal software or access to inappropriate websites is not permitted and may result in dismissal.

- 14.8.2** Staff must access BOSSS UK internal information only for a legitimate and authorised purpose, must not disclose internal information to unauthorised recipients and must maintain confidentiality.
- 14.8.3** Students are not permitted to use the internet for any illegal activity. This includes accessing sites intended for adults, such as pornographic or gambling sites. Students must not search for or browse sites containing offensive, obscene, violent, dangerous, inflammatory, racist or extremist material. Downloading unlicensed material such as music, video, television programmes, games and documents is illegal and is not permitted.
- 14.8.4** Staff, homestays and students must be aware of the principles of the Computer Misuse Act 1990, copyright law and the Data Protection Act 2018.
- 14.8.5** Homestays are required to provide basic internet access for communicating with family by email and for completing homework. Any social or recreational use is to be agreed between the homestay and BOSSS UK. It is appropriate for a student to contribute a reasonable amount towards the homestay's internet cost where the student is using it for social or recreational purposes. Students must not use the homestay's internet to access inappropriate or offensive websites.
- 14.8.6** Homestays who become aware of inappropriate or excessive internet use should discuss it with the student in the first instance. If the issue cannot be managed by the homestay, or is a cause for concern, it must be reported to the DSL or Deputy DSL.
- 14.8.7** Students should familiarise themselves with the UK Council for Internet Safety framework Education for a Connected World, which describes the digital knowledge and skills children should develop at different ages and stages.

14.9 Online safety guidance for students

The internet is a good thing, but it has dangers. When you join an online space you will often find people are friendly, but the person you are talking to may not be who they say they are. Adults have posed as teenagers in order to lure young people into dangerous situations, and cases of this kind have come before the courts in the United Kingdom. This is an offence called grooming.

Safety tips

- Never give out your real name, your address, your telephone number or the name of your school.
- Never agree to meet anyone from an online space on your own. If you do meet, meet in a public place with a parent or another trusted adult. Anyone genuine will be happy with that.
- Tell an adult if someone makes inappropriate suggestions to you or makes you feel uncomfortable online.
- Remember that an AI chatbot is not a person and is not your friend, however much it sounds like one. It cannot keep you safe and it should never replace talking to an adult.

Danger signs

- The person insists on having your address or phone number.
- The person sends you pictures that make you feel uncomfortable, or that you would not want to show to anyone else.
- The person wants to keep their conversations with you secret, or tells you that you will get into trouble if you tell an adult.

- The person wants you to send them pictures of yourself, or to use a webcam in a way that makes you feel uncomfortable.
- The person wants to meet you and tells you not to let anyone know.

If you notice any of these signs, tell your homestay, your student coordinator, your school or your parents. You will not be in trouble.

14.10 Managing internet use in the homestay

- Time restrictions, for example internet available only between agreed hours on school nights, with additional access at weekends.
- Internet use in a communal area such as an open living space, to help the homestay see the sites accessed.
- The same guidelines apply to other electronic media provided in the homestay, for example television media packages, smart televisions, cameras, smartphones, tablets and landlines. This list is not exhaustive given the changing nature of technology.
- Students are responsible and accountable for out of pocket expenses incurred by the homestay through their use of home electronic equipment or services, for example toll calls or payable services on a television media package.

14.11 Cyberbullying, grooming and online exploitation

14.11.1 Cyberbullying means bullying behaviour that takes place by mobile phone or over the internet through messages, images and social networking. Texts, messages or images are sent or posted which hurt, intimidate or embarrass another person. It is not carried out face to face, and people often do not know the identity of the person targeting them, but it is no different from any other form of bullying: the behaviour is the same and the impact is no less devastating. Because information can reach a large audience instantly, and because children can be targeted in their own bedrooms, cyberbullying can happen virtually anywhere. Where a homestay suspects a student is being cyberbullied, they must contact the DSL immediately.

14.11.2 Online grooming is a process used by people with a sexual interest in children to attempt to engage them in sexual acts, either over the internet or in person. The similarity between the grooming process and the ordinary process of building online relationships means that some victimisation goes unnoticed, because many victims do not realise they are being groomed. Offenders may contact children through social networking sites, chat rooms or online games, by pretending to be someone else or by showing an interest in them. It is important that children understand that such people exist and that they should never do anything online or offline that they are uncomfortable with. Where a homestay suspects grooming, they must contact the DSL immediately.

14.11.3 Online sexual exploitation is the sexual abuse of children using technology and online tools. It can involve the exchange of sexual acts for drugs, food, shelter, protection, other basics of life or money, and includes involving children in creating pornography or sexually explicit material. It is a complex form of abuse that can be difficult to identify, and the indicators can be mistaken for normal adolescent behaviour. Even where a young person is old enough to consent to sexual activity, consent is only valid where they make a choice and have the freedom and capacity to make it.

14.11.4 Potential indicators of child sexual exploitation include: acquisition of money, clothes or mobile phones without plausible explanation; gang association or isolation from peers; exclusion or unexplained absence from school; leaving home or care without explanation and persistently going missing or returning late; excessive receipt of texts or calls; returning home under the influence of drugs or alcohol; inappropriate sexualised behaviour for age, or sexually transmitted infection; evidence or suspicion of physical or sexual assault; relationships with controlling or significantly older individuals or groups; multiple callers; frequenting areas known for sex work; concerning use of the internet or social media; increasing secretiveness; and self-harm or significant change in emotional wellbeing. Where a homestay suspects online exploitation, they must contact the DSL immediately.

14.11.5 Links to support on online safety can be found in the KCSIE annex on additional advice and support.

14.12 Mobile phones

14.12.1 From 1 September 2026 the Department for Education guidance Mobile Phones in Schools is statutory, and schools are expected to be phone-free environments by default, including during lessons, breaktimes and lunchtimes.

14.12.2 This does not apply to BOSSS UK or to homestays directly. However, students must comply with their own school's mobile phone rules, which may be stricter than in previous years and stricter than the arrangements in their homestay. Student coordinators will confirm each partner school's policy and brief students and homestays accordingly, so that a student does not breach a school rule they have not been told about. Homestay arrangements for phone use are set out in the Student Behaviour Policy.

14.12.3 A student's phone must never be removed or searched by a homestay. Where there is a safeguarding reason to secure a device, for example under Part 4.4, the homestay contacts the DSL and follows their instruction.

Part 15 Allegations against staff, volunteers and homestays

15.1 The harm threshold

The DSL must be advised of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed, or may have harmed, a child;
- possibly committed a criminal offence against, or related to, a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children; or
- behaved, or may have behaved, in a way that indicates they may not be suitable to work with children.

The last of these includes inappropriate conduct outside of work. Concerns falling below this threshold are low-level concerns and Part 11.2 applies.

15.2 Immediate action

15.2.1 Where there are concerns or specific allegations about the conduct of a member of staff, volunteer, homestay, driver or a member of school staff, and the allegation is believed to meet the harm threshold, the DSL or a BOSSS UK Director must contact the Local Authority Designated Officer promptly and within 24 hours, or the police if appropriate.

15.2.2 KCSIE 2026 expects consideration of a referral to the Designated Officer at an early stage when a concern about a member of staff is reported. The DSL should not wait until the facts are established before seeking advice, and may consult the Designated Officer on a no-names basis.

Do not investigate first. The concern must not be investigated before speaking with the Local Authority Designated Officer or the police. Care must be taken not to jeopardise any future police investigation. The DSL or Director may check basic facts, such as whether the person was working that day, and no more.

15.2.3 KCSIE 2026 confirms that trainees and people on placement are treated in the same way as supply staff and contracted staff for the purposes of managing allegations. For BOSSS UK this means that contracted drivers, volunteers and anyone on placement are within scope of this Part.

15.2.4 If the concern is about senior personnel in BOSSS UK, an external contact may be required in order to proceed. Contacts are at Appendix G.

15.3 Procedure

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

Stage	Action
Stage 1	All concerns should be made in person and recorded, or made in writing, to BOSSS UK. The person raising the concern may wish to receive help from another member of the team or the senior management team, or from external support including a prescribed body such as Ofsted, the NSPCC or the Children's Commissioner. At any future meeting the employee may be accompanied by a colleague or an external supporter, where the choice of supporter is considered appropriate by the Directors.
Stage 2	Within 10 working days the person with whom the concern has been registered acknowledges receipt in writing, stating how the concern will be dealt with, how long a final response will take and what employee support services are available.
Stage 3	After initial enquiries, a decision is made whether an investigation should take place, and whether any false allegation should itself be investigated. The investigation will be an internal investigation, a referral to the police, a referral to AEGIS, or an external independent enquiry.
Stage 4	The employee is informed in writing of the outcome by the Directors. The employee has the right to take their concern to an independent body if they feel it has not been addressed adequately.

15.4 Where an allegation is substantiated and the person is dismissed or would have been dismissed had they not resigned, BOSSS UK will consider whether a referral to the Disclosure and Barring Service is required. There is a legal duty to make such a referral where the harm test is satisfied. In relation to any referral to a professional regulator, BOSSS UK will have regard to the Public Sector Equality Duty.

Appendix A Policy consultation and review

- A.1** This policy is referenced on our website, is available online and on request from BOSSS (UK) Limited, and is provided to parents, students, schools and homestays.
- A.2** The policy is provided to all staff, including temporary staff and volunteers, at induction, alongside the Staff and Homestay Code of Conduct. This and all BOSSS UK policy is reviewed in full annually and revisions are circulated to key individuals.

A.3 Change control

Date	Status	Name	Change control comments
15/10/2016	Initial draft	Victoria Barfoot-Saunt	Initial draft complete and ready for review
02/09/2017	Annual review	Victoria Barfoot-Saunt	Minor amendments
11/04/2018	Annual review	Victoria Barfoot-Saunt	Update further to receipt of new AEGIS minimum standards
12/06/2018	Annual review	Victoria Barfoot-Saunt	Update further to AEGIS feedback
26/05/2019	Annual review	Victoria Barfoot-Saunt	Update further to AEGIS inspection 2 and changes in KCSIE 2018
12/06/2021	Annual review	Victoria Barfoot-Saunt	Update further to KCSIE 2020 and January 2021 changes
04/06/2022	Annual review	Victoria Barfoot-Saunt	Update further to KCSIE 2021 and 2022
13/05/2023	Update	Victoria Barfoot-Saunt	Update further to feedback from AEGIS reaccreditation
01/10/2024	Annual review	Victoria Barfoot-Saunt	Update further to review of AEGIS handbook and regulations and KCSIE 2023 and 2024
27/09/2025	Annual review	Victoria Barfoot-Saunt	Update further to new AEGIS Handbook and KCSIE 2025
12/09/2026	Major revision to v3.0	Victoria Barfoot-Saunt	Full restructure implementing KCSIE 2026. Including registered office updated. Peer on Peer Abuse Procedure V0.1 withdrawn and absorbed into Part 4. Legacy safeguarding contacts reviewed and items requiring verification flagged at Appendix G.
26/09/2026	Amendment to v3.1	Victoria Barfoot-Saunt	Insurance arrangements and policy reading aligned with the AEGIS Quality Standards. Paragraph 10.1 amended: written confirmation of policy reading is no longer collected, the web address of the published pack is stated, and homestays are

Date	Status	Name	Change control comments
			reminded at each annual visit. Home and vehicle insurance documentation is no longer collected from homestays. New Part 9.5 sets out the advice given at recruitment and repeated at each annual visit, and the confirmations recorded on the annual visit record. Bullet at 9.3 amended: the Gas Safety Certificate is still obtained, as Standard 5.10.2.3 requires.

Appendix B AEGIS Check List 1

The duties and responsibilities of BOSSS UK and of our homestays are therefore set out in the following documents:

- the BOSSS UK Homestay Handbook, whose content follows Appendix 3 of the AEGIS Accreditation Handbook;
- the homestay job description issued at recruitment, which states the homestay's responsibilities and reporting line, as required by Standard 2.1.3;
- the guidelines on the behaviour expected of homestays, as required by Standard 5.8.2; and
- the Staff and Homestay Code of Conduct 8.9.

These documents are issued to every homestay at recruitment and reissued at each annual review. They form part of the mandatory homestay training referred to at Part 10.3, which is provided at least annually in accordance with Standard 5.9.1, alongside the annual safeguarding update required by Standard 6.3.

Appendix C Safeguarding and child protection training

The DSL and Deputy DSL must attend suitable live training, delivered either face to face or live remotely, provided or approved by the Local Safeguarding Partnership, AEGIS or the NSPCC. Pre-recorded or self-paced e-learning is not acceptable for the DSL or Deputy DSL role. This training must be renewed at least every two years.

Our staff training is recorded in the Staff Log, certificates are retained for record and renewals are monitored to ensure that mandatory training is completed, including Level 3 Safeguarding Children. We also encourage all staff and homestays to attend a safeguarding course.

Local safeguarding children partnership training is available across the areas in which we place students. Courses typically include Level 3 Safeguarding Children and update, emotional abuse and neglect, protecting disabled children, child sexual exploitation, managing allegations and safer recruitment.

In addition, all staff, volunteers and homestays complete training on the matters listed at Part 10.6, and the Prevent Lead and Deputy Prevent Lead complete the Home Office Prevent training set out in the Anti-Radicalisation and Prevent Duty Policy.

Appendix D Types and signs of abuse and neglect

Staff, volunteers and homestays must read this Appendix. It sets out the categories of abuse, the indicators and what to do if you have a concern.

D.1 The four categories of abuse

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. KCSIE 2026 makes clear that emotional abuse includes verbal abuse and persistent criticism. 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, including interactions beyond a child's developmental capability, as well as overprotection, 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, although it may occur alone.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, and includes causing a child to participate in sexual activity, whether or not the child is aware of what is happening and not necessarily involving violence. The activities may involve physical contact, including assault by penetration, 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. Specific offences apply in relation to children under 13 and children under 16. The sexual abuse of children by other children is a specific safeguarding issue and all staff must be aware of it and of Part 4 of this policy.

Neglect

The persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve a parent or carer failing to provide adequate food, clothing and shelter, including exclusion from home or abandonment; to protect a child from physical and emotional harm or danger; to ensure adequate supervision, including the use of inadequate care-givers; or to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. As set out at Part 6.5, a pattern of repeated omission of prescribed medication or repeated failure to obtain treatment may indicate neglect.

D.2 Additional indicators introduced by KCSIE 2026

Indicator	What it looks like in a guardianship setting
Child-to-parent or child-to-caregiver abuse	A student behaving abusively, violently or coercively towards a homestay carer or a member of their household. The homestay may be reluctant to report it for fear of losing the placement or being judged. Homestays must be told explicitly that they can and should report this.
Emotional abuse through verbal abuse and persistent criticism	Persistent belittling or criticism of a student, whether by a family member overseas, a homestay, a member of staff or another student.
Prejudice-based harm	Racist, faith-based, disability-based or sex-based abuse directed at a student. See Part 2.5.
CCE and CSE as modern slavery	Exploitation of a student that may amount to modern slavery or trafficking, requiring consideration of a National Referral Mechanism referral.
Self-harm, suicidal ideation and suicide risk	See Part 5, which sets out the warning signs and the response.

D.3 Signs of abuse

Signs can include, but are not limited to, the following:

- the student says that they are being physically abused;
- the student has been verbally abused, shouted at or bullied;
- the student says that they have been touched by someone inappropriately or sexually;
- the student says that they have not been properly fed at school or in the homestay;
- the student appears dirty, hungry or inadequately clothed;
- the student has gained or lost a lot of weight; and
- the student has unusual or unexplained injuries.

D.4 Communicating with students

It is important to build trusted relationships with children and young people that facilitate communication. All staff should practise: active listening; empathising with the child's point of view; developing trusting relationships; understanding non-verbal communication; building rapport; explaining, summarising and providing information; giving feedback clearly; and understanding and explaining the boundaries of confidentiality.

D.5 What to do if you have a concern

If a child discloses to you

Do:

- stay calm;
- provide a listening ear and an open mind;
- be reassuring, particularly that the individual is doing the right thing by telling you;

- record the information you are given and report as quickly as possible to the DSL or Deputy DSL, who will decide what further action is needed;
- include a record of the time, date and persons present, using the child's own words; and
- take the child's wishes and feelings into consideration when determining what action to take.

Do not:

- promise to keep the information secret. Make it clear that you have a duty to refer the matter on;
- stop the individual who is freely recalling significant events;
- make the individual tell anyone else. They may have to be formally interviewed later and it is important to minimise the number of times information is repeated;
- make any suggestions about how the incident may have happened;
- question the individual, except to clarify what they are saying; or
- discuss the information with anyone other than the DSL or an appropriate external agency.

If you are concerned but there has been no disclosure

- Make a written, dated note of your observations.
- Inform the DSL or Deputy DSL as soon as possible.
- If you have immediate concerns that a child is at risk of significant harm, contact children's services. If you think a criminal offence has been committed, contact the police. Dial 999 in an emergency.

Appendix E Additional safeguarding issues

This Appendix contains important additional information about specific forms of abuse and safeguarding issues. All staff, volunteers and homestays who work directly with children must read it. Where staff have any concern about a child's welfare, they must act on it immediately, follow this policy and speak to the DSL or Deputy DSL. Where a child is suffering, or is likely to suffer, harm, it is important that a referral to children's social care and, if appropriate, the police is made immediately.

Child criminal exploitation and child sexual exploitation

Both are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, for the financial advantage or increased status of the perpetrator or facilitator, or through violence or the threat of violence. CCE and CSE can affect children of any sex and can include children who have been moved, commonly referred to as trafficking, for the purpose of exploitation. KCSIE 2026 makes clear that CCE and CSE may amount to modern slavery, and that a National Referral Mechanism referral should be considered.

Child criminal exploitation

Specific forms of CCE include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced

or manipulated into committing vehicle crime or threatening or committing serious violence. Children can become trapped by this exploitation, as perpetrators can threaten victims and their families with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives, or begin to carry a knife for a sense of protection. Because children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. The experience of girls who are criminally exploited can be very different to that of boys, and the indicators may not be the same.

Child sexual exploitation

CSE is a form of child sexual abuse. It can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. It can affect any child who has been coerced into engaging in sexual activities, including 16 and 17 year olds who can legally consent to sex. Some children may not realise they are being exploited, for example because they believe they are in a genuine romantic relationship. The victim may have been sexually exploited even if the sexual activity appears consensual. Signs may include children who appear with unexplained gifts or new possessions; who associate with other young people involved in exploitation; who have older boyfriends or girlfriends; who suffer from sexually transmitted infection or become pregnant; who suffer changes in emotional wellbeing; who misuse drugs and alcohol; who go missing for periods of time or regularly come home late; and who regularly miss school or education.

County lines

Criminal exploitation of children is a geographically widespread feature of county lines activity: drug networks or gangs groom and exploit children to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement 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.

Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home, or suffer domestic abuse in their own intimate relationships, which is sometimes called teenage relationship abuse. All of these can have a detrimental and long-term impact on health, wellbeing, development and ability to learn. In some cases a child may blame themselves for the abuse or may have had to leave the family home as a result. For our students, domestic abuse may be occurring in the family home overseas, which creates particular difficulty in accessing support, and the DSL should take advice on the appropriate route.

Serious violence

All staff should be aware of the 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 injury. Unexplained gifts or new possessions could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

KCSIE 2026 expands this section with further detail on assault and on the carrying of weapons. Staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, including being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending such as theft or robbery. Students should be reminded that carrying a knife is a criminal offence in the United Kingdom, including where it is carried for self-protection, and that the law here may differ from the law in their home country.

Mental health

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis. Staff are well placed to observe children day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and the DSL informed. Part 5 of this policy sets out the standalone treatment of self-harm, suicidal ideation and suicide risk introduced by KCSIE 2026.

So-called honour-based abuse, FGM and forced marriage

So-called honour-based abuse encompasses incidents or crimes committed to protect or defend the supposed honour of the family or community, including female genital mutilation, forced marriage and practices such as breast ironing. Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators. All forms are abuse, regardless of the motivation, and must be handled and escalated as such. Where staff have a concern, they must speak to the DSL, who will activate local safeguarding procedures using national and local protocols for multi-agency liaison with police and children's social care.

Female genital mutilation 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 United Kingdom and is a form of child abuse with long-lasting harmful consequences. Section 5B of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, places a statutory duty on teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover, either through disclosure by the victim or visual evidence, that FGM appears to have been carried out on a girl under 18. That mandatory duty does not fall on guardianship organisation staff, but where anyone at BOSSS UK discovers that an act of FGM appears to have been carried out, they must report to the DSL immediately and the DSL will report to the police.

Forcing a person into 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. Threats can be physical, emotional or psychological. A lack of full and free consent can arise where a person does not consent, or cannot consent. Staff can contact the Forced Marriage Unit for advice; contacts are at Appendix G. This risk may be heightened around return to the home country for school holidays, and any concern that a student may not return must be reported to the DSL immediately.

Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. As with other forms of harm, protecting children from this risk is part of our safeguarding approach. 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. It 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 vulnerability, and radicalisation can occur through many methods and settings, including social media. Staff should be alert to changes in behaviour which could indicate that a child may be in need of help or protection, and should act proportionately, which may include the DSL making a referral to the Channel programme. Channel focuses on providing support at an early stage to people identified as vulnerable to being drawn into terrorism, and engagement with it is voluntary at all stages.

See the Anti-Radicalisation and Prevent Duty Policy for full detail and for our Prevent Lead contacts.

Children missing education, children with family members in prison, and the court system

Children going absent or missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. Part 8 applies.

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders provides information designed to support professionals working with offenders and their children.

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Age-appropriate guides for children aged 5 to 11 and 12 to 17 are available on GOV.UK and explain each step of the process, the support and special measures available, the courtroom structure and the use of video links.

Homelessness

Being homeless, or being at risk of becoming homeless, presents a real risk to a child's welfare. The DSL should be aware of contact details and referral routes into the local housing authority so that concerns can be raised at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Referrals to or discussion with the local housing authority should not replace a referral to children's social care where a child has been harmed or is at risk of harm. In most cases staff will be considering homelessness in the context of children living with their families. In some cases 16 and 17 year olds could be living independently and will require a different level of intervention and support. For our students, the analogous risk is the loss of a placement or of school fees funding, and any indication that a student may have nowhere to go at the end of term must be reported to the DSL immediately.

Additional advice and support

Issue	Source of guidance
Abuse	What to do if you're worried a child is being abused, Department for Education
Domestic abuse	Home Office information and guidance; NSPCC; Refuge; SafeLives

Issue	Source of guidance
Bullying	Preventing and tackling bullying, including cyberbullying, Department for Education
Children and the courts	Ministry of Justice advice for child witnesses
Children missing education	Children missing education, Department for Education statutory guidance
Children with family members in prison	National Information Centre on Children of Offenders
Child exploitation	County lines guidance, Home Office; Child sexual exploitation guide for practitioners, Department for Education; Trafficking: safeguarding children
Drugs	Drugs: advice for schools, Department for Education; Talk to Frank
So-called honour-based abuse	FGM information and resources and multi-agency statutory guidance; Forced marriage information and practice guidelines
Harmful sexual behaviour	NSPCC harmful sexual behaviour framework; Brook Sexual Behaviours Traffic Light Tool
Health and wellbeing	Supporting pupils at school with medical conditions; Mental health and behaviour in schools
Nudes and semi-nudes	Sharing nudes and semi-nudes: advice for education settings, UK Council for Internet Safety
Online safety	Education for a Connected World, UK Council for Internet Safety; Thinkuknow, CEOP
Private fostering	Private fostering: local authorities, Department for Education statutory guidance
Radicalisation	Prevent duty guidance, Home Office; Educate Against Hate
Generative AI	Generative artificial intelligence in education, Department for Education
Violence	Preventing youth violence and gang involvement, Home Office; Serious violence strategy

Appendix F Definitions

Term	Definition
Agent	An educational agent is an individual or organisation offering advisory services to students and their parents, such as school placements, in exchange for a fee paid by the family or commission paid by the educational institution they represent.
Child protection	The protection of children from violence, exploitation, abuse and neglect. Article 19 of the UN Convention on the Rights of the Child provides for the protection of children in and out of the home.

Term	Definition
Day student	A pupil who is resident within a homestay for more than 28 consecutive days.
Designated Safeguarding Lead	The named person with lead responsibility for safeguarding children and young people within the organisation.
Educational guardian	A designated person who acts in loco parentis and has overarching pastoral and academic responsibility for the safeguarding, care and welfare of a student while they attend school in the United Kingdom. Responsibilities include being authorised to make certain decisions regarding emergency medical and dental treatment and matters of a disciplinary nature. An educational guardian is not a legal guardian.
Exeat	Designated weekend leave or period of absence from a boarding school.
Guardianship organisation	An organisation which provides the service of educational guardian for international students, referred to in this policy as a GO. The organisation may also be responsible for arranging accommodation for its students at an approved homestay.
Harmful sexual behaviour	Sexual behaviour by a child that falls outside the developmentally expected range and which is harmful or abusive, whether directed at younger children, peers, adults or the child themselves. Referred to as HSB. See Part 4.3.
Homestay	A household approved and appointed, following a rigorous safer recruitment process undertaken by the guardianship organisation, to provide accommodation for and care of a student at weekends, exeats, half terms, at the beginning or end of term, or during term time in the case of day students.
KCSIE	Keeping Children Safe in Education, statutory guidance issued by the Department for Education. References in this policy are to the 2026 edition unless otherwise stated.
LADO	Local Authority Designated Officer, the officer responsible for managing allegations against people who work with children. Referred to in this policy as the Designated Officer.
Legal guardian	A person appointed by a court to care for a child because, for example, the child's parent or guardian has died. It can also signify a person acting as a testamentary guardian or guardian of a child's estate.
Nudes and semi-nudes	Images or videos showing a child nude or partially nude, including images that have been digitally altered and images generated using artificial intelligence. Replaces the term sexting. See Part 4.4.
Parent	An overseas parent who appoints a guardianship organisation to act in loco parentis for their child while studying in a day or boarding school or college in the United Kingdom.
Primary carer	The person in the homestay with overall responsibility for the international student while they are staying with the homestay.
Regulated activity	Work with children of a kind, and at a frequency, which requires an Enhanced DBS check with children's barred list information. See Part 9.2.
Safeguarding	The action taken to promote the welfare of children and protect them from harm.

Term	Definition
SEND	Special educational needs and disabilities.
Student	An overseas pupil who is a day pupil, weekly boarder or full boarder in a school or college in the United Kingdom, whether independent or maintained.

Appendix G Useful contacts

G.1 BOSSS UK

Role	Name	Contact
Designated Safeguarding Lead and Prevent Lead	Tina Wong	+44 (0)7776 206352 · info@bosssguardians.com
Deputy DSL and Deputy Prevent Lead	Eva (Haiwa) Qui	+44 (0)7922 152628 · info@bosssguardians.com
Managing Director	Betty Ong-Stevens	+44 (0)7710 946398 info@bosssguardians.com
Compliance Director	Victoria Barfoot-Saunt	+44 (0)7767201388 info@bosssguardians.com
Office		+44 (0)1202 980804 · bosss.guardian@outlook.com
Registered office		C/O The Cousins, Office No 216, Building 1 Chalfont Park, Chalfont St. Peter, Gerrards Cross, Buckinghamshire, England, SL9 0BG

G.2 Emergency and national

Organisation	Contact
Police, fire, ambulance, emergency	999
Police, non-emergency	101
NHS, non-emergency medical	111
NSPCC Helpline	0808 800 5000
NSPCC Whistleblowing Advice Line	0800 028 0285 · help@nspcc.org.uk
Childline	0800 1111 · www.childline.org.uk
Children's Commissioner for England	020 7783 8330 · www.childrenscommissioner.gov.uk
Protect, whistleblowing advice	020 3117 2520 · www.protect-advice.org.uk
Anti-Terrorist Hotline / Textphone	0800 789 321 / 0800 789 321 · Hours 24/7

Organisation	Contact
Forced Marriage Unit	020 7008 0151 (out of hours: 020 7008 5000) · fmu@fcdo.gov.uk
AEGIS	The Wheelhouse, Bond's Mill Estate, Bristol Road, Stonehouse, Gloucestershire, GL10 3RF · +44 (0)1453 821293 · secretary@aegisuk.net

G.3 Local safeguarding partnerships and designated officers

Area	Contact	Status
Pan-Dorset Safeguarding Children Partnership	01305 221196 · pan-dorsetscp@dorsetcouncil.gov.uk · County Hall, Colliton Park, Dorchester, Dorset, DT1 1XJ	Confirmed 12/09/2026
BCP Safeguarding Children Partnership	01202 093732 · safeguardingchildrenpartnershipbcp@bcpcouncil.gov.uk · Civic Centre, Bourne Avenue, Bournemouth, BH2 6DY	Confirmed 12/09/2026
Dorset Council LADO	01305 221122 · LADO@dorsetcouncil.gov.uk Referrals are made using the Dorset Council LADO referral form available from the Pan-Dorset Safeguarding Children Partnership website	Confirmed 13/09/2026
BCP Council LADO	01202 817600 · lado@bcpcouncil.gov.uk Contact via BCP Safeguarding Children Partnership above	Confirmed 13/09/2026
Hampshire Safeguarding Children Partnership	www.hampshirescp.org.uk	Confirmed 12/09/2026
Hampshire LADO	01962 876355 · hscp@hants.gov.uk · www.hants.gov.uk Referrals are made using the Hampshire LADO Notification form, and enquiries using the Hampshire LADO Enquiry form, both available from Hampshire County Council. Individual LADOs must not be emailed directly for new advice or referrals	Confirmed 13/09/2026

G.4 Where a student is placed outside these areas

Where a student is placed in a homestay outside Dorset, Bournemouth, Christchurch and Poole, or Hampshire, the DSL identifies and records the relevant local safeguarding children partnership, children's social care contact, out of hours contact and Local Authority Designated Officer for that area before the placement begins, and adds them to the placement record. This is checked at the annual homestay visit.

End of policy