

Safeguarding, Child Protection and Safer Recruitment Policy

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Contents

1. Policy Statement	4
2. Our Safeguarding Principles.....	4
3. Governance	5
3.1 Governance Structure	5
3.2 Director	5
3.3 Designated Safeguarding Lead (DSL)	6
3.4 Safeguarding Continuity	6
3.5 Associate Guardians.....	7
3.6 Host Families.....	7
3.7 Partnership Working.....	8
3.8 Monitoring and Continuous Improvement	8
4. Safer Recruitment	8
4.1 Safer Recruitment Principles	9
4.2 Recruitment Standards	9
4.3 Recruitment of Employees	10
4.4 Recruitment of Host Family	10
4.5 Ongoing Suitability and Monitoring	10
4.6 Record Keeping.....	11
5. Safeguarding in Practice	11
5.1 A Child-centred Approach	11
5.2 Working in Partnership	12
5.3 Safeguarding Throughout the Student Journey.....	12
5.4 Student Welfare and Wellbeing	13
5.5 Information Sharing	13
5.6 Record Keeping.....	14
5.7 Managing Safeguarding Concerns	14
5.8 Responding to Immediate Risk	14
5.9 Confidentiality	15
6. Child Protection and Safeguarding Risks	15
6.1 Child Protection.....	15
6.2 Recognising Abuse.....	16

6.3 Specific Safeguarding Risks.....	16
7. Allegations Against Adults	17
8. Low Level Concerns	17
9. Whistleblowing	18
10. Online Safety and Digital Communication	18
11. Training and Safeguarding Awareness	19
11.1 Commitment	19
11.2 Induction	19
11.3 Ongoing Training	19
11.4 Training Records	19

1. Policy Statement

Lumis Education is committed to safeguarding and promoting the welfare of every child in our care. We believe every child has the right to feel safe, be listened to and receive appropriate support. Safeguarding is everyone's responsibility.

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

This policy has been developed in accordance with current UK safeguarding legislation, statutory guidance and recognised best practice. It is informed by the latest editions of [Keeping Children Safe in Education \(KCSIE\)](#), [Working Together to Safeguard Children 2026](#), and the [Children Act 1989](#) and [Children Act 2004](#). It also takes account of the Human Rights Act 1998, [the Equality Act 2010](#), [the Data Protection Act 2018](#) and [UK GDPR](#) in relation to the handling of safeguarding information, and [the Prevent Duty guidance](#) where applicable. The policy will be reviewed annually, or sooner if there are changes to legislation, statutory guidance, or organisational practice.

Key Safeguarding Contact Details

Role	Name	Telephone No.	Email
Designated Safeguarding Lead (DSL)	Zhengyan (Grace) He	+44 (0)7307615576	gracehe@lumiseducation.com
Lumis 24-hr Emergency Contact	Zhengyan (Grace) He	+44 (0)7307615576 +86 13911890589	gracehe@lumiseducation.com or admin@lumiseducation.com

2. Our Safeguarding Principles

Lumis believes that safeguarding is not simply responding to abuse—it is creating an environment where children feel safe, valued and listened to.

Our safeguarding practice is underpinned by the following principles:

- The welfare of the child is paramount.
- Children have the right to be listened to.
- Early intervention prevents harm.
- Concerns must never be ignored.
- Safeguarding is everyone's responsibility.
- Decisions should always be in the child's best interests.
- Information should be shared appropriately to protect children.
- Safeguarding is everyone's business, regardless of role.

3. Governance

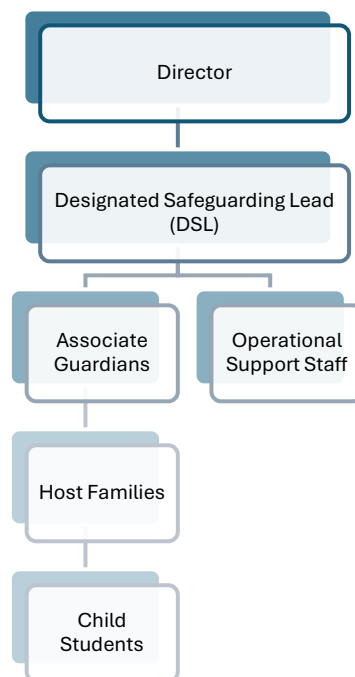
Safeguarding is central to Lumis Education's mission and underpins every aspect of our guardianship service. The welfare of every child is paramount, and safeguarding considerations are integrated into all aspects of our work, including student placements, host family selection, welfare monitoring, recruitment, training and quality assurance.

As an education guardianship organisation supporting international students attending UK boarding schools, Lumis Education works in partnership with schools, parents, host families and statutory safeguarding agencies to promote the safety, wellbeing and best interests of every student.

The Director has overall accountability for safeguarding governance and for ensuring that appropriate safeguarding arrangements, policies and procedures are implemented, monitored and regularly reviewed.

3.1 Governance Structure

The governance structure ensures clear lines of accountability for safeguarding throughout the organisation.



All safeguarding concerns, regardless of where they arise, must be reported immediately to the Designated Safeguarding Lead. The DSL is responsible for assessing concerns, determining the appropriate course of action and liaising with schools, parents and statutory agencies where necessary.

3.2 Director

The Director has overall responsibility for safeguarding governance and organisational compliance.

This includes ensuring that:

- safeguarding remains a strategic priority across the organisation;
- safeguarding policies are approved, implemented and reviewed annually or sooner where legislation or guidance changes;
- sufficient resources are allocated to support effective safeguarding practice;
- a suitably trained Designated Safeguarding Lead is appointed;
- safer recruitment procedures are consistently applied;
- safeguarding training is provided and regularly updated for all relevant personnel;
- safeguarding incidents are reviewed to identify learning and improve practice;
- the organisation complies with relevant legislation and the BSA Certified Guardian Standards.

3.3 Designated Safeguarding Lead (DSL)

Lumis Education has appointed a suitably trained Designated Safeguarding Lead (DSL) with overall operational responsibility for safeguarding and child protection across the organisation.

The Designated Safeguarding Lead is responsible for:

- leading the implementation of safeguarding and child protection arrangements across Lumis Education;
- acting as the primary point of contact for safeguarding advice, support and concerns;
- receiving, assessing and responding to safeguarding concerns and determining appropriate action;
- making referrals to Children's Social Care, the Police, the Local Authority Designated Officer (LADO) and other statutory agencies where appropriate;
- liaising with schools, parents, Host Families, Associate Guardians and relevant external agencies to safeguard students;
- maintaining accurate, confidential safeguarding records in accordance with statutory requirements;
- ensuring safeguarding concerns are managed promptly, consistently and in the best interests of the child;
- promoting a positive safeguarding culture throughout the organisation;
- ensuring appropriate safeguarding training, guidance and support are available to employees, Associate Guardians and Host Families; and
- monitoring the effectiveness of safeguarding arrangements and supporting the continuous improvement of safeguarding practice.

The Designated Safeguarding Lead will maintain up-to-date knowledge of relevant safeguarding legislation, statutory guidance and best practice to ensure Lumis Education's safeguarding arrangements remain effective and compliant.

3.4 Safeguarding Continuity

As Lumis Education is currently a small organisation, no Deputy Designated Safeguarding Lead has been appointed at this stage.

The organisation recognises the importance of ensuring that safeguarding concerns can always be acted upon without delay. If the Designated Safeguarding Lead is unexpectedly unavailable and a safeguarding concern requires an immediate response, other staff members, Associate Guardians, Host Families and any individual acting on behalf of Lumis Education must not delay action. They should contact the appropriate emergency service, Children's Social Care, the Local Authority Designated Officer (LADO), or the student's School Designated Safeguarding Lead, as appropriate to the nature of the concern, and inform the DSL as soon as it is safe and reasonably practicable to do so.

As the organisation grows, Lumis Education will review the need to appoint and train a Deputy Designated Safeguarding Lead to strengthen safeguarding resilience and continuity.

3.5 Associate Guardians

Associate Guardian is an employee of Lumis Education, engaged under a zero-hours employment contract, who acts on behalf of the organisation to provide pastoral care, welfare support and guardianship services to assigned students. Associate Guardians play a key role in promoting the welfare of students and are often the adult with the most regular contact outside the school environment.

They are expected to:

- maintain regular contact with assigned students;
- monitor students' welfare, wellbeing and adjustment to life in the UK;
- conduct welfare visits and maintain appropriate records;
- always maintain professional boundaries;
- recognise and report safeguarding concerns promptly;
- cooperate with schools, parents and external professionals where appropriate;
- complete mandatory safeguarding training and comply with Lumis Education's safeguarding procedures.

Associate Guardians are not responsible for investigating safeguarding concerns or determining whether abuse has occurred. Their responsibility is to observe, record and report concerns immediately to the Designated Safeguarding Lead.

3.6 Host Families

Host Families provide accommodation and pastoral support during exeats, half-term, holidays and emergency placements. They play an important role in creating a safe, welcoming and supportive environment for students.

Host Families are expected to:

- provide safe and suitable accommodation;
- promote students' welfare and wellbeing;
- maintain appropriate professional boundaries;
- complete required safeguarding training;
- report any safeguarding or welfare concerns immediately to Lumis Education;
- cooperate fully with monitoring, reviews and quality assurance processes.

3.7 Partnership Working

Lumis Education recognises that safeguarding is most effective when organisations work collaboratively.

As an education guardianship organisation, Lumis Education works collaboratively with a range of safeguarding partners, including:

- boarding schools and their Designated Safeguarding Leads (DSLs);
- parents and those with parental responsibility;
- Associate Guardians and Host Families;
- Local Authority Children's Social Care services;
- the Police;
- Local Authority Designated Officers (LADOs);
- NHS services and other healthcare professionals;
- Local Safeguarding Partnerships; and
- other agencies involved in supporting the child.

Lumis Education recognises and respects the statutory safeguarding responsibilities of schools and local authorities. Where safeguarding concerns arise, Lumis Education will work cooperatively with relevant agencies, ensuring that safeguarding decisions are made in the best interests of the child and in accordance with statutory guidance.

3.8 Monitoring and Continuous Improvement

The Director and Designated Safeguarding Lead are responsible for monitoring the effectiveness of safeguarding arrangements across the organisation.

This includes:

- annual review of safeguarding policies and procedures;
- safeguarding audits and compliance checks;
- monitoring safeguarding training;
- review of welfare visit records;
- host family monitoring and quality assurance;
- review of safeguarding incidents and lessons learned;
- feedback from students, parents, schools and host families;
- ongoing review of safer recruitment procedures.

The organisation is committed to continuous improvement and will update its safeguarding arrangements in response to changes in legislation, statutory guidance, BSA requirements and organisational learning.

4. Safer Recruitment

Lumis Education is committed to recruiting, selecting and retaining suitable adults who share our commitment to safeguarding and promoting the welfare of children. Safeguarding is embedded throughout every stage of recruitment, selection, appointment and ongoing monitoring process.

Recruitment procedures are set out in the Lumis Education Safer Recruitment Procedure, which defines the recruitment, selection, vetting, induction and monitoring arrangements for staff, Associate Guardians, Host Families and any other individuals engaged by Lumis Education who may have contact with Children.

Lumis Education recognises that safer recruitment is an essential part of safeguarding and aims to deter, identify and reject unsuitable individuals from working with or having regular contact with children.

4.1 Safer Recruitment Principles

Lumis Education will ensure that:

- the welfare of children remains paramount throughout every recruitment decision;
- recruitment is conducted fairly, transparently and without unlawful discrimination;
- safeguarding responsibilities are clearly reflected in recruitment advertisements and job descriptions;
- all applicants complete a formal application and suitability declaration;
- employment history is scrutinised and any gaps or inconsistencies are explored;
- applicants are assessed for their motivation to work with children, safeguarding awareness, professional boundaries and suitability during the selection process;
- references are obtained directly from referees, verified where appropriate and considered before confirming an appointment;
- identity, right to work, qualifications and professional status (where applicable) are verified;
- Enhanced DBS checks and Children's Barred List checks (where legally eligible) are completed before an individual undertakes regulated activity;
- overseas criminal record checks or alternative safeguarding checks are undertaken where appropriate;
- all appointments remain conditional upon satisfactory completion of the required pre-engagement checks;
- all new staff, Associate Guardians and Host Families receive safeguarding induction appropriate to their role before commencing duties.

4.2 Recruitment Standards

All recruitment decisions are based on competence, suitability, integrity and a demonstrated commitment to safeguarding children.

Lumis Education will:

- ensure recruitment decisions are made against published role requirements;
- assess all applicants consistently and objectively;
- require at least two satisfactory references, including a professional reference where appropriate;
- verify references where clarification is required;
- ensure any criminal record disclosures are considered individually through a documented risk assessment undertaken by the Designated Safeguarding Lead before any appointment is confirmed;

- maintain confidentiality throughout the recruitment process.

Where a DBS check has not been completed, no individual will undertake regulated activity or have unsupervised access to children unless permitted by law and supported by a documented safeguarding risk assessment and appropriate supervision arrangements.

4.3 Recruitment of Employees

Employees, including Associate Guardians, are recruited in accordance with Lumis Education's Safer Recruitment Procedure. Prior to engagement, all employees will undergo a recruitment and selection process appropriate to their role, including suitability assessment, interview, identity verification, right to work checks, reference checks, Enhanced DBS checks (and Children's Barred List checks where legally eligible), safeguarding induction and any other checks required by legislation or organisational policy.

Recruitment decisions will assess not only professional competence but also safeguarding values, professional judgement, integrity and the ability to maintain appropriate boundaries when working with children.

As Associate Guardians have regular direct contact with students and frequently work independently, additional consideration will be given to their experience of working with children and young people, communication skills, decision-making, safeguarding knowledge and ability to respond appropriately to welfare concerns.

4.4 Recruitment of Host Family

Host Families provide an important element of Lumis Education's guardianship service and are recruited and approved through a comprehensive assessment process designed to ensure students are placed in safe, suitable and supportive homes.

Before approval, each Host Family will undergo:

- an application and suitability assessment;
- interview;
- reference checks;
- Enhanced DBS checks for eligible household members;
- verification of identity and relevant documentation;
- home inspection and health and safety assessment;
- safeguarding induction;
- risk assessment where appropriate.

The detailed approval, inspection and assessment process is set out in the Safer Recruitment Procedure.

4.5 Ongoing Suitability and Monitoring

Safer recruitment is an ongoing process rather than a one-off event. Lumis Education will maintain the ongoing suitability of staff, Associate Guardians and Host Families through:

- safeguarding induction and continuing professional development;
- regular safeguarding updates;

- annual suitability declarations where appropriate;
- supervision and performance review;
- review of safeguarding concerns, complaints and low-level concerns;
- periodic DBS status checks and renewal processes where applicable;
- annual review visits for approved Host Families together with additional visits where concerns arise.

Individuals are expected to inform Lumis Education immediately of any change in circumstances that may affect their suitability to work with or accommodate children.

4.6 Record Keeping

Lumis Education maintains a Single Central Record (SCR) of recruitment and safeguarding checks for employees, Associate Guardians and Host Families in accordance with statutory guidance and BSA certified guardianship requirements.

Recruitment records are maintained securely and confidentially in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and Lumis Education's Data Protection Policy.

5. Safeguarding in Practice

5.1 A Child-centred Approach

Lumis Education adopts a child-centred approach to safeguarding in accordance with the principles set out in *Working Together to Safeguard Children*. The welfare of the child is paramount and underpins all decisions, actions and services provided by Lumis Education.

We recognise that every child has the right to be safe, to be heard and to have their views respected. Safeguarding decisions will always take account of the child's wishes and feelings, whilst recognising that these must be balanced with professional judgement and the need to protect the child from harm.

Lumis Education will:

- place the best interests of the child at the centre of all safeguarding decisions;
- listen to children and take their concerns seriously;
- respect each child's age, maturity, culture, language, religion, identity, disability and individual circumstances;
- recognise that some children may be more vulnerable than others and require additional support;
- encourage a culture of professional curiosity and early intervention where concerns arise; and
- work to ensure that children know who they can speak to if they feel worried, unsafe or require support.

Safeguarding is everyone's responsibility, and all adults working on behalf of Lumis Education are expected to act promptly where they have concerns about a child's welfare.

5.2 Working in Partnership

Safeguarding is most effective when organisations work collaboratively and share relevant information appropriately. As a guardianship organisation, Lumis Education operates between the student, family, school, Host Family and wider safeguarding agencies, and recognises its responsibility to facilitate effective communication whilst respecting each organisation's statutory responsibilities. In practice, Lumis Education will:

- maintain regular communication with schools, parents and Host Families regarding students' welfare;
- work closely with School Designated Safeguarding Leads, House Parents and pastoral staff to coordinate support for students;
- share safeguarding information promptly, lawfully and on a need-to-know basis;
- respect the statutory safeguarding responsibilities of schools, Children's Social Care and other safeguarding agencies;
- contribute appropriately to safeguarding meetings, welfare planning and multi-agency discussions where requested;
- challenge decisions professionally where this is considered necessary to promote the welfare of a child; and
- maintain clear records of safeguarding communications, decisions and actions.

For students attending UK boarding schools, the School Designated Safeguarding Lead (DSL) remains Lumis Education's principal safeguarding partner in relation to concerns arising within the school environment.

Where safeguarding concerns relate to Lumis Education's own services (including Host Families, Associate Guardians, transport providers or other representatives), or where a concern meets the threshold for statutory intervention, the Designated Safeguarding Lead will make direct referrals to the relevant Local Authority Children's Social Care service, the Police or the Local Authority Designated Officer (LADO), as appropriate. Lumis Education will liaise with the student's school and other relevant agencies unless doing so would place the child at greater risk or prejudice a statutory investigation.

5.3 Safeguarding Throughout the Student Journey

Safeguarding is embedded throughout every stage of the guardianship journey, from pre-arrival planning through to the student's departure from the UK.

Before Arrival

Prior to a student's arrival, Lumis Education seeks to identify and minimise foreseeable safeguarding risks by:

- obtaining relevant medical, welfare and emergency contact information;
- considering any additional needs or vulnerabilities;
- assessing the suitability of accommodation arrangements;
- matching students with appropriately approved Host Families where required;
- planning safe travel and arrival arrangements;
- ensuring appropriate consent and emergency contact information is available.

During Placement

Throughout the student's placement, Lumis Education promotes safeguarding through:

- regular communication with students, parents, schools and Host Families;
- welfare monitoring appropriate to the student's age and needs;
- liaison with school pastoral teams and safeguarding staff;
- responding promptly to welfare concerns;
- maintaining appropriate safeguarding records; and
- reviewing safeguarding arrangements whenever circumstances change.

School Holidays, Exeats and Leave Periods

Where Lumis Education arranges accommodation or support outside term time, consideration will be given to:

- the suitability and safety of accommodation;
- travel arrangements;
- appropriate supervision;
- welfare support; and
- communication with parents and schools.

Emergencies

Lumis Education maintains a 24-hour emergency support service to respond appropriately to safeguarding, welfare or other emergency situations affecting students in its care.

5.4 Student Welfare and Wellbeing

Lumis Education recognises that safeguarding extends beyond protection from abuse and includes promoting students' overall welfare, wellbeing and personal development.

International students may experience additional challenges associated with living away from home, adapting to a new culture and education system, and developing independence.

Lumis Education therefore seeks to support students through:

- promoting emotional wellbeing and resilience;
- supporting students experiencing homesickness or anxiety;
- facilitating a positive transition into UK boarding school life;
- encouraging independence whilst providing age-appropriate support;
- recognising the impact of cultural adjustment;
- promoting positive mental health;
- signposting students to appropriate support services where necessary; and
- working closely with schools, parents and Host Families to support students' wellbeing.

Safeguarding concerns relating to a student's emotional or mental wellbeing will be managed in accordance with this policy and, where appropriate, in partnership with the student's school and relevant external agencies.

5.5 Information Sharing

Effective safeguarding depends upon timely and appropriate information sharing. Lumis Education will share information where it is necessary to safeguard or promote the welfare of a

child, in accordance with relevant legislation, statutory guidance and the UK General Data Protection Regulation (UK GDPR). Information sharing will be:

- lawful;
- necessary;
- proportionate;
- accurate;
- timely; and
- limited to those who have a legitimate need to know.

The safety and welfare of the child will take precedence where there is a conflict between maintaining confidentiality and protecting a child from harm.

5.6 Record Keeping

Lumis Education will ensure that safeguarding records are:

- factual, objective and contemporaneous;
- signed and dated where appropriate;
- stored securely and confidentially;
- accessible only to authorised staff members;
- retained in accordance with statutory requirements and the Lumis Education Data Protection Policy.

Safeguarding records will be maintained separately from general student records where appropriate.

5.7 Managing Safeguarding Concerns

Every member of staff, Associate Guardian and Host Family has a responsibility to act if they have a concern about the safety or welfare of a child.

Lumis Education expects safeguarding concerns to be:

- recognised promptly;
- taken seriously;
- reported without delay;
- recorded accurately; and
- managed in accordance with statutory guidance and organisational procedures.

No member of staff, Associate Guardian or Host Family should investigate safeguarding concerns themselves. Responsibility for determining the appropriate course of action rests with the Designated Safeguarding Lead, working in partnership with relevant agencies where necessary.

Operational guidance for reporting, recording and escalating safeguarding concerns is set out in the Safeguarding Reporting Procedure.

5.8 Responding to Immediate Risk

Where a child is believed to be at immediate risk of significant harm, immediate action will always take precedence over normal reporting arrangements.

Any member of staff, Associate Guardian or Host Family who believes a child is in immediate danger must take appropriate action to secure the child's safety. This may include contacting the emergency services without delay where there is an immediate threat to life or safety.

Where statutory safeguarding referral thresholds are met, the DSL of Lumis Education will make direct referrals to the relevant Local Authority Children's Social Care service (or Multi-Agency Safeguarding Hub (MASH), where applicable), the Police or the Local Authority Designated Officer (LADO), as appropriate.

The DSL will also liaise with the student's School Designated Safeguarding Lead (DSL), parents and other relevant agencies where appropriate and where doing so would not place the child at greater risk or prejudice a statutory investigation.

Where the DSL is unavailable and delay would place a child at increased risk of harm, any member of staff may make a direct referral to the Police or Children's Social Care in accordance with statutory guidance and must inform the DSL as soon as reasonably practicable.

5.9 Confidentiality

Safeguarding information is confidential but is not secret. Information relating to safeguarding concerns will only be shared with those who have a legitimate professional need to know in order to protect the child or fulfil statutory responsibilities.

All safeguarding concerns, discussions, decisions and actions will be recorded appropriately and handled in accordance with data protection legislation and organisational policies.

6. Child Protection and Safeguarding Risks

6.1 Child Protection

Child protection forms an integral part of safeguarding and refers to the action taken to protect individual children who are suffering, or are likely to suffer, significant harm.

Lumis Education recognises that, while boarding schools hold the primary responsibility for the day-to-day safeguarding of students during school activities, education guardians also play an essential role in recognising concerns, responding appropriately and working in partnership with schools and statutory agencies to protect children from harm.

Lumis Education is committed to:

- placing the safety and welfare of the child above all other considerations;
- recognising concerns at the earliest opportunity;
- responding promptly and appropriately to safeguarding concerns;
- working collaboratively with schools, Children's Social Care, the Police and other safeguarding partners;
- supporting children throughout safeguarding processes; and
- maintaining accurate safeguarding records and acting in accordance with statutory guidance.

Lumis Education does not investigate safeguarding concerns. Responsibility for assessing concerns and making statutory referrals rests with the Designated Safeguarding Lead and the relevant safeguarding agencies.

6.2 Recognising Abuse

Lumis Education recognises that abuse can occur in any family, institution, community or online environment and may be perpetrated by adults or children. Abuse may occur through a single incident or a pattern of behaviour and can have significant long-term effects on a child's physical, emotional and psychological wellbeing.

All staff, Associate Guardians and Host Families are expected to remain professionally curious and be alert to signs that a child may be experiencing abuse, neglect or exploitation. No single indicator should be viewed in isolation; however, any concern, disclosure or change in behaviour should be taken seriously and reported promptly in accordance with this policy.

In accordance with *Keeping Children Safe in Education* (KCSIE), Lumis Education recognises the four main categories of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Detailed descriptions and indicators of abuse are contained within the latest edition of [*Keeping Children Safe in Education*](#) and form part of Lumis Education's safeguarding training programme.

6.3 Specific Safeguarding Risks

Lumis Education recognises that children may also be vulnerable to a range of specific safeguarding risks, including but not limited to:

- child-on-child abuse;
- child sexual exploitation (CSE);
- child criminal exploitation (CCE), including County Lines;
- online abuse and cyberbullying;
- grooming and exploitation through social media or online platforms;
- radicalisation and extremism;
- serious violence;
- domestic abuse;
- forced marriage;
- honour-based abuse;
- female genital mutilation (FGM);
- modern slavery and trafficking;
- missing children;
- mental health concerns where these may indicate a safeguarding issue.

As an organisation supporting international students, Lumis Education also recognises additional safeguarding risks associated with:

- cultural adjustment and social isolation;
- language barriers;
- homesickness and emotional vulnerability;
- dependence on unfamiliar adults;
- travel arrangements and periods spent outside school;
- host family placements.

These factors do not in themselves indicate abuse but may increase a child's vulnerability and will be considered when assessing safeguarding concerns and determining appropriate support. Staff should not seek to determine whether abuse has occurred but should report concerns immediately to the Designated Safeguarding Lead.

7. Allegations Against Adults

Lumis Education takes all allegations and concerns regarding the behaviour of adults working with, for or on behalf of the organisation seriously. This includes allegations relating to employees, Associate Guardians, Host Families and any other adult engaged by Lumis Education.

An allegation may indicate that an individual 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 in a way that indicates they may pose a risk of harm to children; or
- behaved in a way that may indicate they are unsuitable to work with children.

Any allegation or concern must be reported immediately to the Designated Safeguarding Lead. Where the allegation concerns the Designated Safeguarding Lead, it must be reported directly to the Director or, where appropriate, directly to the Local Authority Designated Officer (LADO).

The Designated Safeguarding Lead will make referrals to the Local Authority Designated Officer (LADO), the Police or Children's Social Care where statutory thresholds are met.

Lumis Education will cooperate fully with any statutory investigation and will take appropriate action to safeguard children while ensuring that allegations are managed fairly, confidentially and in accordance with the principles of natural justice.

8. Low Level Concerns

Lumis Education recognises that maintaining a strong safeguarding culture requires concerns about adult behaviour to be identified and addressed before they escalate. A low level concern is any behaviour by an adult working on behalf of Lumis Education that is inconsistent with the organisation's Code of Conduct but does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

Examples may include:

- poor professional boundaries;
- inappropriate language;
- unnecessary one-to-one situations;
- inappropriate use of electronic communication;
- behaviour that causes concern but does not indicate immediate risk of harm.

All low-level concerns should be reported promptly to the Designated Safeguarding Lead. Reports will be considered proportionately, recorded appropriately and used to identify patterns of behaviour, support professional development and maintain a culture of openness, transparency and continuous improvement. No individual will suffer detriment for reporting a genuine safeguarding concern in good faith.

9. Whistleblowing

Lumis Education is committed to promoting a culture of openness, transparency and accountability in which safeguarding concerns can be raised without fear of victimisation or retaliation.

Any employee, Associate Guardian, Host Family or other individual working on behalf of Lumis Education who has concerns about safeguarding practice, unsafe behaviour or failures to protect children is encouraged to report those concerns promptly.

Concerns may relate to:

- unsafe safeguarding practice;
- failure to follow safeguarding procedures;
- behaviour that places children at risk;
- attempts to conceal safeguarding concerns; or
- other conduct that may compromise the safety or welfare of children.

Reports will be treated seriously, investigated appropriately and handled confidentially, so far as is reasonably possible. No individual will suffer detriment for raising a genuine safeguarding concern in good faith.

10. Online Safety and Digital Communication

Lumis Education recognises that technology forms an integral part of the educational and social lives of international students. While digital technologies provide significant educational and communication benefits, they also present safeguarding risks. Lumis Education is committed to promoting the safe, responsible and appropriate use of technology and will work with students, schools, parents and Host Families to support online safety.

Online safeguarding risks may include:

- online grooming;
- cyberbullying;
- inappropriate or harmful online content;

- sharing of indecent images;
- online sexual abuse or exploitation;
- financial scams and online fraud;
- misuse of social media and messaging platforms;
- artificial intelligence (AI)-generated images, videos or communications used to deceive, exploit or harm children.

Staff, Associate Guardians and Host Families are expected to model safe online behaviour, maintain appropriate professional boundaries when communicating electronically with students and report any online safeguarding concerns immediately. Students will be encouraged to seek support if they experience online abuse or feel unsafe online.

Electronic communication with students must always be appropriate, professional and consistent with Lumis Education's Code of Conduct. Any online safeguarding concern should be reported immediately in accordance with this policy.

11. Training and Safeguarding Awareness

11.1 Commitment

Lumis Education recognises that effective safeguarding depends upon appropriately trained, knowledgeable and confident adults. All employees, Associate Guardians and Host Families are expected to understand their safeguarding responsibilities and to maintain up-to-date knowledge of safeguarding legislation, statutory guidance and organisational procedures appropriate to their role.

Safeguarding training forms an integral part of Lumis Education's commitment to creating and maintaining a strong safeguarding culture.

11.2 Induction

All new employees will receive safeguarding induction before undertaking duties involving contact with children.

Approved Host Families will receive safeguarding guidance and induction appropriate to their role before accommodating students.

11.3 Ongoing Training

Lumis Education is committed to ensuring safeguarding knowledge remains current. Employees, Associate Guardians and Host Families will receive safeguarding updates and refresher training appropriate to their role and responsibilities. The Designated Safeguarding Lead will maintain an appropriate level of safeguarding expertise through regular professional development and continuing training.

11.4 Training Records

Lumis Education will maintain records of safeguarding induction, training and continuing professional development. Training records will be reviewed periodically to ensure that safeguarding training remains current and appropriate to each individual's role.