

Thames Hightech Ltd

Safeguarding and Child Protection Policy

Version 2025/26

Policy owner	Yuhong Li	Applies to	Directors, staff, volunteers, homestays and contractors in contact with students
Designated Safeguarding Lead (DSL)	Yuhong Li	24-hour emergency contact	Yuhong Li 07538826068
Email	Andrew.li@thameshightech.com	Main operating area	Greater London
Effective date	1 September 2025	Next review due	31 August 2026 or earlier if guidance changes

Purpose of this policy This policy explains how Thames Hightech Ltd safeguards and promotes the welfare of children in its care, how concerns are identified and responded to, and how staff, homestays and volunteers are expected to act at all times.

1. Policy statement

Thames Hightech Ltd recognises its moral and legal responsibility to safeguard and promote the welfare of every child under the age of 18 with whom it works. We adopt a child-centred approach and operate on the basis that safeguarding is everyone's responsibility and that concerns must be acted upon promptly, professionally and proportionately.

We aim to provide a safe, respectful and supportive environment in which students, staff, volunteers and homestays feel confident to raise concerns. We expect all adults working for, with, or on behalf of the organisation to share our safeguarding commitment and to follow this policy together with the organisation's related policies, procedures and codes of conduct.

This policy has been updated for the 2025/26 review cycle and is intended to align with the AEGIS Quality Standards (September 2025 revision), Keeping Children Safe in Education 2025, and Working Together to Safeguard Children 2026.

2. Scope and linked policies

This policy applies to directors, employees, volunteers, homestays, local coordinators, contractors, transfer providers and any other adults acting on behalf of Thames Hightech Ltd where they may come into contact with children.

It should be read alongside the organisation's related policies and documents, including:

- Safer Recruitment Policy
- Low Level Concerns Policy
- Whistleblowing Policy
- Online Safety Policy
- Anti-Bullying (including Cyberbullying) Guidelines

- Anti-Radicalisation / Prevent Policy
- Missing Student Procedure
- Emergency Procedure
- Data Protection Policy and Privacy Notice
- Staff and Homestay Code of Conduct
- Student, Parent and Homestay Handbooks

3. Key safeguarding contacts

Role	Name / team	Contact details	Notes
Designated Safeguarding Lead (DSL)	Yuhong Li	07538826068 Andrew.li@thameshightech.com	First point of contact for safeguarding concerns.
24-hour emergency contact	Yuhong Li	07538826068 Andrew.li@thameshightech.com	Use if the concern arises out of hours or immediate contact is required.
Prevent lead	Yuhong Li	07538826068 Andrew.li@thameshightech.com	Lead for radicalisation concerns and Prevent referrals.
Local authority children's services / MASH (organisation base)	London Borough of Hammersmith & Fulham	020 8753 6600 020 8753 6610 (anonymous consultation/advice)	Anyone can contact children's services if worried about a child.
Local Authority Designated Officer (LADO)	London Borough of Hammersmith & Fulham	LADO@lbhf.gov.uk	For allegations about adults working with children.
Police	Emergency / non-emergency	999 / 101	Call 999 if a child is at immediate risk of harm.

Where a student is placed outside the organisation's home borough, Thames Hightech Ltd will also identify and use the relevant local authority children's services, safeguarding partnership and police contacts for the area in which the child is staying.

4. Definitions

Safeguarding and promoting the welfare of children means protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with safe and effective care; and taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding and refers to activity undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

For the purpose of this policy, a child is any person under the age of 18.

Contextual safeguarding recognises that some risks to children arise outside the home, including in schools, peer groups, social settings, transport, placements and online environments.

5. Principles

- The welfare of the child is paramount.
- All students have the right to feel safe, respected and listened to.
- Safeguarding concerns can arise in any setting and may involve adults, peers or online behaviour.
- We will listen to children, take their wishes and feelings seriously, and act in their best interests.
- We will share information on a need-to-know basis where this is necessary to protect a child.

- We will work with schools, parents, homestays, local authorities, the police and other agencies where appropriate.
- We will maintain accurate safeguarding records and act without delay where there is immediate risk of harm.

6. Roles and responsibilities

6.1 Directors

The directors hold overall accountability for safeguarding arrangements within the organisation. They will ensure there is an effective safeguarding culture, suitable policies and review arrangements, safe recruitment procedures, appropriate training, and sufficient oversight of safeguarding concerns, allegations, complaints and learning points.

6.2 Designated Safeguarding Lead (DSL)

The DSL takes lead responsibility for safeguarding and child protection, including online safety, child-on-child abuse, liaison with schools and external agencies, and the maintenance of safeguarding records. The DSL will:

- receive, assess and respond to safeguarding concerns;
- make or support referrals to children's social care, the police, Prevent/Channel or other relevant agencies;
- act as the main point of contact for staff, homestays and volunteers on safeguarding matters;
- liaise with partner schools, parents, local authorities and external professionals as appropriate;
- ensure safeguarding concerns are recorded clearly, securely and promptly;
- ensure this policy and related procedures are reviewed and updated at least annually;
- ensure safeguarding training and updates are provided and recorded.

6.3 Staff, volunteers, homestays and contractors

All adults working for or on behalf of Thames Hightech Ltd must read and follow this policy, maintain professional curiosity, recognise possible indicators of abuse or neglect, report concerns promptly, maintain appropriate boundaries, and complete training relevant to their role. No adult should assume that another person will take action.

7. Recognising safeguarding concerns

Abuse and neglect may take place in person, in a family or community setting, through peer relationships, in a placement, or online. All staff and homestays should be alert to signs of physical abuse, emotional abuse, sexual abuse and neglect, as well as exploitation, coercion and harmful behaviour.

Safeguarding concerns may include, but are not limited to:

- child sexual exploitation (CSE) and child criminal exploitation (CCE), including county lines;
- bullying, cyberbullying and discriminatory behaviour;
- child-on-child abuse, including sexual harassment and sexual violence;
- online abuse, grooming, sextortion, exposure to harmful content and image-sharing concerns;
- radicalisation and extremism;
- domestic abuse and so-called honour-based abuse, including forced marriage and female genital mutilation;
- serious violence, missing episodes, trafficking and modern slavery;
- mental health concerns that may indicate abuse, neglect, exploitation or a serious welfare risk.

A child may not recognise their experiences as abuse or may not feel able to disclose what is happening. Concerns should therefore be assessed on the basis of the child's presentation, known facts, context, professional curiosity and any pattern of behaviour, rather than waiting for proof.

8. Immediate action and reporting procedure

8.1 Immediate danger

If a child is in immediate danger or a crime may have been committed, the adult receiving the concern must call 999 without delay, then inform the DSL as soon as possible.

Immediate safety takes priority over internal reporting lines.

8.2 Reporting a concern internally

Any concern, allegation, disclosure, incident, missing episode, unexplained injury, concerning behaviour or welfare issue must be reported to the DSL as soon as possible and on the same day. A written record must follow promptly using the organisation's concern / incident form.

- Do not investigate or attempt to prove the concern yourself.
- Do not promise confidentiality to the child.
- Record the facts, the child's own words where possible, and any action taken.
- Preserve evidence where relevant and do not view or forward images unless there is a clear safeguarding reason and the DSL has directed this.

8.3 If the DSL is unavailable or the response is inadequate

If the DSL is unavailable, the concern still must not be delayed. Any adult may contact children's social care, the police or other appropriate safeguarding agency directly. If a person believes a concern has not been taken seriously or appropriately escalated, they must continue to press for action and may use the whistleblowing procedure.

8.4 Liaison with schools and parents

Where appropriate and lawful, Thames Hightech Ltd will liaise with the DSL at the student's school and with parents or carers. However, we will not seek parental consent or notify parents first if this would place the child at increased risk, prejudice a police investigation, or otherwise be contrary to the child's welfare.

9. How to respond to a disclosure

- Stay calm, listen carefully and take the child seriously.
- Reassure the child that they have done the right thing by telling you.
- Do not promise to keep secrets; explain that you may need to pass the information to people who can help keep them safe.
- Avoid leading questions. Use open prompts such as "Tell me", "Explain" or "Describe".
- Make a contemporaneous note, including date, time, people present and the child's own words where possible.
- Report the matter to the DSL immediately and complete the written record.

10. Child-on-child abuse

Thames Hightech Ltd adopts a zero-tolerance approach to child-on-child abuse. We recognise that this can happen between children of any age and gender and may take place online or offline, in school, in placements, during transport, on trips or in social settings.

Child-on-child abuse may include bullying, prejudice-based behaviour, abuse in intimate relationships, sexual harassment, sexual violence, image-sharing abuse, initiation or hazing behaviour, coercion, threats and other harmful conduct.

All reports will be taken seriously. The DSL will make a case-by-case assessment of risk and support needs for the victim, the alleged perpetrator and any other children affected. Partner schools will be informed as appropriate, and referrals to children's social care or the police will be made where thresholds are met.

11. Online safety

Online safety is a safeguarding issue. Students may be exposed to harmful content, harmful contact, harmful conduct and online commerce risks. Staff, volunteers and homestays must remain alert to signs of grooming, exploitation, coercion, cyberbullying, image-sharing concerns, fraud and radicalisation.

Thames Hightech Ltd addresses online safety through this policy, the Online Safety Policy, the Student Handbook and staff / homestay training. Concerns involving online harm should be treated as safeguarding concerns and reported in the same way as any other child protection concern.

12. Prevent and radicalisation

Thames Hightech Ltd recognises that safeguarding includes protecting children from radicalisation and extremism. Concerns may arise from what a child says, views online, changes in behaviour, isolation, coercive influences or association with extremist material or people.

Any concern about radicalisation must be reported promptly to the DSL / Prevent Lead. Where appropriate, advice will be sought from local Prevent contacts and referrals made to Channel or the police.

13. Mental health and welfare concerns

Mental health concerns do not in themselves always indicate abuse, but they may be a sign that a child has suffered or is at risk of abuse, neglect, exploitation or serious harm. Staff and homestays are not expected to diagnose conditions, but they are expected to notice concerning presentation and report safeguarding-related welfare concerns promptly.

Where a student's mental health or behaviour creates a safeguarding concern, this policy will be followed. Thames Hightech Ltd will work with schools, parents, health professionals and other appropriate services to support safe planning and appropriate escalation.

14. Allegations or concerns about adults

14.1 Allegations that may meet the harm threshold

Any allegation or concern that an adult working with or on behalf of Thames Hightech Ltd has:

- behaved in a way that has harmed a child 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; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children, including transferable risk,

must be reported immediately to the director/case manager and referred to the LADO without delay. The organisation will not investigate such matters before taking LADO advice.

14.2 Low-level concerns

Behaviour by an adult that is inconsistent with the Staff and Homestay Code of Conduct, but which does not meet the harm threshold, will be managed in line with the Low Level Concerns Policy. Low-level concerns are still important because they may indicate patterns of behaviour or a need for intervention, support or disciplinary action.

14.3 Referrals to the DBS and regulatory action

Where required by law or guidance, Thames Hightech Ltd will make referrals to the Disclosure and Barring Service and any other relevant body if an individual is removed from regulated activity because they have harmed a child or posed a risk of harm to a child.

15. Record keeping, confidentiality and information sharing

All safeguarding concerns, disclosures, discussions, decisions and actions must be recorded clearly, accurately and promptly. Records will be stored securely, separately from general student files where appropriate, and accessed only by those who need the information to safeguard a child.

Information will be shared in line with child protection law, data protection law and the organisation's Data Protection Policy. Data protection legislation is not a barrier to sharing safeguarding information where a failure to share could place a child at risk.

- A clear summary of the concern must be recorded.
- Any advice sought and by whom must be recorded.
- The rationale for decisions, referrals and non-referrals must be recorded.
- Records must show what action was taken, by whom and when.
- Safeguarding records will be retained in line with the organisation's retention schedule and legal obligations.

16. Safer recruitment and conduct expectations

Thames Hightech Ltd operates safer recruitment procedures for staff, homestays and relevant contractors. Required checks may include identity verification, right to work, references, DBS checks, declarations, suitability and other checks relevant to the role.

All adults must follow the Staff and Homestay Code of Conduct, maintain appropriate professional boundaries, avoid one-to-one situations that present avoidable risk, and report any concern, including about another adult, without delay.

17. Training and safeguarding updates

The DSL will complete suitable DSL-level safeguarding training and refresh this at least every two years, with knowledge updated more regularly as required.

All staff, volunteers and homestays will receive safeguarding induction and role-appropriate training before or as soon as reasonably practicable after commencing their duties, together with regular safeguarding updates and annual refreshers. Training records will be retained.

- All adults will be made aware of this policy, the DSL contact details and the reporting process.
- Training will include online safety, recognising abuse, professional boundaries and escalation.
- Prevent awareness training will be provided where relevant to the role.

18. Monitoring, review and local adaptation

This policy will be reviewed at least annually and sooner if there is a change in legislation, guidance, organisational structure, contact details or operational practice. Local authority contact details and any school-specific or placement-specific safeguarding arrangements will be checked and updated as necessary.

This policy is intended for use across Thames Hightech Ltd's operations in Greater London. Where students are placed outside the organisation's home borough, the DSL will ensure relevant local safeguarding contacts and procedures are identified and followed.

Appendix 1 – Safeguarding Concern / Incident Record

Complete as soon as possible after the concern arises. Record facts, not opinions. Use the child's own words where possible.

Date of record

Date and time of incident / disclosure

Name and role of person completing form

Student name and date of birth

Location / context

Nature of concern / disclosure

Exactly what was seen, heard or disclosed

Immediate action taken

Was the DSL informed? If yes, when and how?

Were parents informed? If no, why not?

Was a referral made? If yes, to whom?

Outcome / next steps

Appendix 2 – Student Removal from School / Placement Information Form

This form should be completed by the school or relevant setting before a student is removed from site because of a welfare, behaviour or mental health concern, unless an emergency makes this impossible.

School / setting

Student name and date of birth

Date and time of requested collection / removal

Reason for removal request

Has the student been assessed by a medical professional? If yes, summarise outcome

Is the student at risk of harm to self or others?

What steps has the school / setting already taken?

Relevant safeguarding / mental health information to support safe planning

Name, position and signature of school representative

Date

End of policy.