



SAFEGUARDING AND CHILD PROTECTION POLICY

(Aligned with AEGIS Quality Standards 6.1 &
Appendix 4 – September 2025)

SUNSHINE365 LIMITED

V1.2
Dec 2025

1. Purpose and Scope

Sunshine365 Limited (“Sunshine365”) is committed to safeguarding and promoting the welfare of all children and young people under the age of 18 who are placed in our care. We recognise our moral and statutory responsibility to protect children from harm, abuse, neglect and exploitation.

This policy applies to:

- All staff (employed, contracted, agency or temporary)
- Directors and senior leaders
- Volunteers
- Homestay providers and members of their households
- Local coordinators and any third parties acting on behalf of Sunshine365

This policy is written in accordance with:

- AEGIS Accreditation and Guardianship Organization Quality Standards (Standard 6.1 & Appendix 4)
- Keeping Children Safe in Education (KCSIE) – from 1 September 2025
- Working Together to Safeguard Children

This policy is publicly available and can be downloaded from the Sunshine365 website (<https://sunshine365.uk/policy-documents/>).

2. Policy Statement

We believe that:

- Every child and young person has the right to feel safe, valued, and respected.
- Safeguarding is everyone’s responsibility.
- Effective safeguarding requires partnership between students, parents, schools, homestays, agencies, and local authorities.

We will:

- Prevent harm through safe recruitment, staff training, supervision, and clear conduct standards.
- Protect students by listening, responding promptly, and escalating concerns appropriately.
- Support students and staff through transparency, guidance, and access to professional help.

Where there is a safeguarding concern, Sunshine365 will always consider the child’s wishes and feelings, taking these into account when determining what action to take, while ensuring the child’s safety remains paramount.

3. Barriers to Disclosure and Professional Curiosity

All staff and homestays must be aware that:

- Children may not feel ready, able or confident to tell someone that they are being abused, exploited or neglected
- Children may not recognize their experiences as harmful
- Cultural, language, emotional or developmental factors may prevent disclosure

This must not prevent staff or homestays from exercising professional curiosity. Any concerns, no matter how small, must be discussed with the Designated Safeguarding Lead (DSL).

4. Supporting Policies and Procedures

This policy should be read in conjunction with:

- Safer Recruitment Policy
- Low-Level Concerns Policy
- Emergency Procedures
- Online Safety Policy
- Missing Student Policy
- Whistleblowing Policy
- Staff and Homestay Code of Conduct
- Student Welfare and Mental Health Procedures (where applicable)
- Anti-Radicalisation and Prevent Duty Policy
- Anti-Bullying (including Cyberbullying) Policy
- Student Behaviour Code of Conduct
- Online Safety Policy
- Complaints Policy
- Data Protection and Privacy Policy

5. Definitions

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

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

Child: any person under the age of 18.

Designated Safeguarding Lead (DSL): the person with lead responsibility for safeguarding and child protection within Sunshine365.

Local Safeguarding Partnership (LSP): the statutory safeguarding partnership for a local authority area.

Local Authority Designated Officer (LADO): the officer responsible for managing allegations against adults who work with children.

Regulated Activity: work that involves close, unsupervised contact with children as defined by the Safeguarding Vulnerable Groups Act 2006.

Low-Level Concern: any concern, no matter how small, about an adult's behaviour that may indicate they are unsuitable to work with children.

6. Types of Abuse and Neglect

All staff and homestays must be aware of the four main categories of abuse, as outlined in KCSIE:

Physical Abuse

Deliberate physical harm such as hitting, shaking, burning, poisoning, suffocation or fabricated illness.

Emotional Abuse

Persistent emotional maltreatment that causes severe and adverse effects on a child's emotional development.

Sexual Abuse

Forcing or enticing a child to take part in sexual activities, including online abuse and child-on-child sexual abuse.

Neglect

Persistent failure to meet a child's basic physical and/or psychological needs.

Additional Safeguarding Risks

- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE), including county lines
- Domestic abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Radicalization and extremism (Prevent)
- Child-on-child abuse, including sexual violence and sexual harassment
- Online abuse and cyberbullying
- Mental health concerns linked to safeguarding risk

Staff and homestays must be alert to common indicators of abuse and neglect and report concerns immediately.

7. Indicators of Abuse and Neglect

Staff, volunteers and homestay providers should be alert to the **possible indicators of abuse and neglect**, recognising that these indicators may vary depending on the child's age, culture, disability or communication needs.

Possible indicators include, but are not limited to:

Physical abuse indicators may include:

- Unexplained injuries or injuries inconsistent with explanations given
- Frequent bruising, burns or fractures
- Fear of physical contact or flinching when approached

Emotional abuse indicators may include:

- Excessive withdrawal, anxiety or low self-esteem
- Sudden changes in behaviour or emotional responses
- Developmental delay not linked to a medical cause

Sexual abuse indicators may include:

- Sexualised behaviour or language inappropriate for the child's age
- Unexplained physical symptoms (e.g. pain, soreness)
- Reluctance to be alone with certain individuals
- Online sexualised behaviour or secretive internet use

Neglect indicators may include:

- Poor personal hygiene or inappropriate clothing
- Persistent hunger or tiredness
- Unmet medical or emotional needs
- Frequent lateness or absence from school

- 8.** The presence of one indicator alone does not necessarily mean abuse, but **staff and homestays must report any concerns to the DSL** so that appropriate action can be taken. Child-on-Child Abuse (Including Sexual Violence and Sexual Harassment)

Sunshine365 recognises that children can abuse other children. This includes bullying, physical abuse, sexual violence, sexual harassment and online abuse.

Sunshine365 adopts a zero-tolerance approach to child-on-child abuse. All incidents will be taken seriously, responded to promptly, and managed in partnership with schools and relevant agencies.

Where child-on-child abuse is reported:

- The DSL will assess risk and provide immediate safeguarding support
- The DSL will liaise with the school DSL
- Referrals will be made to the LSP or police where thresholds are met
- Victims, alleged perpetrators and other affected children will be supported

9. Indicators of Child-on-Child Abuse

Child-on-child abuse refers to abuse that occurs between children and young people. It can include physical abuse, emotional abuse, sexual violence, sexual harassment, bullying, cyberbullying and online abuse.

Possible indicators of child-on-child abuse may include:

- One child displaying power or control over another
- Injuries caused by another child
- Sexualised language or behaviour between children
- One child being fearful, withdrawn or anxious around another
- Reports of harassment, coercion or intimidation
- Sharing of sexual images or messages between children (including online)
- Bullying behaviour, including exclusion, name-calling or threats

10. All concerns relating to child-on-child abuse will be taken seriously and managed in line with **KCSIE guidance**, with a clear focus on safeguarding, risk assessment and appropriate support for all children involved. Supporting Students with Mental Health Concerns

Sunshine365 recognises that mental health concerns may indicate safeguarding risk.

Where a student presents with mental health issues:

- A risk assessment will be undertaken
- The DSL will liaise with parents, schools and relevant professionals
- Temporary removal from school may be considered where necessary to safeguard the student
- Support services and external agencies will be engaged as appropriate

11. Self-Reporting Duty

All staff, volunteers and homestays have a duty to self-report to the DSL:

- Any criminal investigations, cautions or convictions
- Any safeguarding concerns involving themselves or household members
- Any change in circumstances that may affect suitability to work with children

Sunshine365 will self-report significant safeguarding matters to AEGIS in line with Standard 6.5.

12. How Students Can Raise a Concern

Students are encouraged to raise concerns with:

- Their homestay carer
- A trusted adult or school staff member
- Their guardian or local coordinator
- The Sunshine365 DSL

Students are reassured that:

- They will be listened to

- Their concerns will be taken seriously
- They will be supported and kept safe

13. How to Receive a Disclosure

When a child discloses abuse or harm:

- Listen carefully and reassure the child
- Do not promise confidentiality
- Avoid leading questions
- Record the disclosure accurately using the child's own words
- Report the concern immediately to the DSL

14. Roles and Responsibilities

Designated Safeguarding Lead (DSL)

- Name: Dongmei Wang
- Email: amywangyuk@gmail.com; amywang@sunshine365.uk
- Telephone: 07553 165318

The DSL:

- Has lead responsibility for safeguarding and child protection
- Acts as the main point of contact for concerns
- Liaises with LSPs, LADO, police and partner schools
- Maintains secure safeguarding records
- Undertakes DSL training at least every two years

Deputy DSL

Where the DSL is unavailable, concerns must be escalated to the Director.

Director

The Director has overall accountability for safeguarding and will act as case manager where allegations involve the DSL.

15. Liaison with Local Safeguarding Partnerships (LSPs)

Sunshine365 works in partnership with Local Safeguarding Partnerships (LSPs) and local authority children's social care services in all areas where students are placed.

Where there is concern that a child is suffering or is likely to suffer significant harm, Sunshine365 will, where appropriate, seek advice and/or make a referral to the relevant local authority children's social care team (or Multi-Agency Safeguarding Hub/Single Point of Access) and/or the police.

Appendix A provides the current contact details for local authority children's social care (including out-of-hours arrangements) in the areas Sunshine365 operates.

16. Local Authority Designated Officer (LADO)

Sunshine365 will refer to the relevant Local Authority Designated Officer (LADO) (also known in some areas as the designated manager for allegations) within 24 hours of any allegation that an adult working with children:

- has behaved in a way that has harmed, or may have harmed, a child;
- may have committed a criminal offence against or related to a child; and/or
- has behaved towards a child or children in a way that indicates they may pose a risk of harm.

Sunshine365 will follow KCSIE Part Four processes and will not investigate allegations internally until advice has been obtained from the LADO and/or police as appropriate.

Appendix B provides the current LADO contact details for the areas Sunshine365 operates.

17. Liaison with Parents, Agents and Schools

Sunshine365 will:

- Work openly with parents wherever possible
- Liaise closely with partner schools' DSLs
- Share information with agents only where necessary and on a need-to-know basis

Parents will not be informed where doing so would place a child at increased risk.

18. Safer Recruitment and Allegations Against Adults

Sunshine365 follows safer recruitment practices, including enhanced DBS/PVG checks and barred list checks where applicable.

Allegations against adults will be managed in line with KCSIE Part Four, involving the LADO and external agencies as required.

Low-level concerns will be managed in accordance with the Low-Level Concerns Policy.

19. Record Keeping and Confidentiality

All safeguarding records are:

- Stored securely and separately from general student files
- Accessed on a strict need-to-know basis
- Retained in line with statutory guidance and data protection law

20. Signposting to Other Procedures

This policy signposts readers to:

- **Emergency Procedures**
This policy outlines the actions to be taken in serious incidents, including medical emergencies, missing students, serious safeguarding incidents and other critical situations.
- **Low-Level Concerns Policy**
Staff, volunteers and homestay providers are expected to report low-level concerns in accordance with Sunshine365's **Low-Level Concerns Policy**, which sets out how such concerns are recorded, reviewed and managed.
- **Online Safety Policy**
Guidance on online safety, acceptable use and responding to online concerns is set out in Sunshine365's **Online Safety Policy**.

Those 3 documents are available on request and, where applicable, via the Sunshine365 Website.

21. Review and Monitoring

This policy is reviewed annually or sooner if required by:

- Changes in legislation or guidance
- A safeguarding incident
- Updates to AEGIS standards

22. Approval

Approved by: Director, Sunshine365 Limited

Date: October 2025

Signature: _____

Appendix A: Local Authority Children's Social Care / MASH / SPA Contact DETAILS (OPERATIONAL AREAS)

Emergency: If a child is in immediate danger, call 999.

Berkshire (Reading, Wokingham, Bracknell Forest, Slough, West Berkshire, Windsor & Maidenhead)

- Reading – Children's Single Point of Access (CSPoA) (Brighter Futures for Children): 0118 937 3641; cspoa@reading.gov.uk
- Wokingham – Children's Social Care / Referral & Assessment Team: 0118 908 8002; triage@wokingham.gov.uk
- Bracknell Forest – Children's Services (Concern for a child): 01344 352005 (Mon–Fri office hours); Out of hours: 01344 351999
- Slough Children First – Referral & Assessment Service: 01753 875362; sloughchildren.referrals@sloughchildrenfirst.co.uk

- Out of hours (Emergency Duty Team): 01344 351999; EDT@bracknell-forest.gov.uk

- West Berkshire – Contact, Advice and Assessment Service (CAAS): 01635 503090 (public); child@westberks.gov.uk
- Windsor & Maidenhead (Achieving for Children) – Single Point of Access: 01628 683150

Oxfordshire

- Oxfordshire MASH (concerns about a child): 01865 519800

Buckinghamshire

- Buckinghamshire First Response / MASH: 01296 383962 (office hours)
- Emergency Duty Team (out of hours): 0800 999 7677

Appendix B: LADO Contact Details (Operational Areas)

- Reading (Brighter Futures for Children): 0118 937 2684; LADO@reading.gov.uk
- Wokingham: LADO@wokingham.gov.uk
- Bracknell Forest: 01344 351572; lado@bracknell-forest.gov.uk
- Slough Children First: 07927 681858; LADO@sloughchildrenfirst.co.uk
- West Berkshire: 01635 503153; lado@westberks.gov.uk
- Windsor & Maidenhead (Achieving for Children): 07774 332675; LADO@achievingforchildren.org.uk
- Oxfordshire: 01865 810603; lado.safeguardingchildren@oxfordshire.gov.uk
- Buckinghamshire: 01296 382070; Secure-LADO@buckinghamshire.gov.uk