

# Oxford International Junior Programmes: Safeguarding and Child Protection Policy

## Terminology

**OIEG** is the Oxford International Education Group (referred to in this document as OIEG). The Junior Programme is a part of the Oxford International Education Group

**All adults working with children** is the term used in this policy to describe all adults (everyone) who will come into contact with under 18's during our programmes. This list is not exhaustive but will include: teaching and activity staff, school directors and management staff, agents, hosts school staff, transport drivers, host families and group leaders, building cleaners and contractors.

**Safeguarding** and promoting the welfare of children is:-

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- Taking action to enable all children to have the best outcomes.

**Child Protection** is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**Duty of Care** Everyone is required to take reasonable care in any situation in which harm to someone else could be foreseen. **Higher Duty of Care** The standard of care expected with increased experience and specialist expertise where, through training or experience, one may be expected to visualise more clearly the results of one's actions in one's area/s of specialism. **Negligence** Acts or omissions by someone with a duty of care in which this is breached by falling below the standard of care required in the circumstances to protect others from the unreasonable risk of harm.

**OIEG Safeguarding Lead** is the senior member of staff within OIEG who has key responsibility for raising awareness within the organisation of issues relating to the welfare of children and young people, and the promotion of a safe environment of the children and young people on OIEG programmes. As a minimum, this person has completed Advanced Safeguarding Training for Designated Leads (previously referred to as level 3). The OIEG Safeguarding lead is **David Wilkins**. He is supported by **OIEG Deputy Designated Safeguarding Leads** (Robin Fry, Daniel Tourt, and Philippa Tanaka).

The person who is usually the first point of contact will be the Centre Manager or the Welfare Manager. Any concerns can then be passed onto the Welfare Coordinator Meg Over or the OIEG Safeguarding Lead David Wilkins.

At each of our sites there is a senior member of staff who has the on-site responsibility for Child Protection in that centre and is accountable for the day to day matters, training and recording systems. As a minimum, this person has completed Advanced Level Safeguarding Training for Designated Staff (previously referred to as level 2). This person will have a named Deputy who will also have completed Advanced Level Safeguarding Training for Designated Staff (previously referred to as level 2) as a minimum.

## Statement

OIEG is committed to the definition safeguarding and promoting the welfare of children. This policy is written with regard to the following documents:

- 'Keeping Children Safe in Education' (Sept 2016) and currently being reviewed for 2018
- 'Working Together to Safeguard Children' (March 2015)
- 'What to Do If You're Worried a Child Is Being Abused' (2006)
- The Children Acts 1989 and 2004
- The Education Act 2002
- Counter Terrorism and Security Act 2015
- The Prevent Strategy (June 2015)

We believe that safeguarding is the individual and collective responsibility of everyone working in the company. Our policy recognises that the welfare and interests of children are paramount in all circumstances and is committed to ensuring its safeguarding practices exceed statutory requirements and the requirements of all our various accrediting bodies.

As Part of our safeguarding policy OIEG will:

- Promote and prioritise the safety and wellbeing of children and young people
- Ensure 'All Adults Working With Children' understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people.
- Ensure all relevant staff or others working with us receive child protection training as part of their induction (online training before starting work) and that this is reviewed every year for staff or others working directly with children and at least every 2 years for other staff.
- Ensure as part of this induction all staff know the names of all relevant designated staff
- Ensure all staff are aware that abuse can happen to any student
- Ensure staff and other adults (working on our behalf with children) are aware how to respond to a student who may tell of abuse
- Ensure children in our care, their parent/carers and overseas agents are aware of our Safeguarding leads, this policy and procedures as appropriate
- Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern
- Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- Prevent the employment/deployment of unsuitable individuals through following safe recruitment procedures
- Contact the LADO within 12 hours of a disclosure or suspicion of abuse. If a child makes a disclosure against a family member or other then the referral will be to the Children's Services (MASH)
- Keep written confidential records of concerns about students (noting date, event and action taken) even if there is no need to refer to social services immediately.
- Ensure relevant and applicable safeguarding arrangements and procedures are used *in operation*
- Report to the DBS within one week of leaving OIEG, any person whose services are no longer required because he or she is considered unsuitable to work with children.

The policy and procedures will be widely promoted and are mandatory for everyone involved in OIEG. Failure to comply with the policy and procedures will be addressed without delay and may

ultimately result in dismissal/exclusion from the organisation.

## Entitlement

- OIEG acknowledges that some children, including disabled children and young people or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take all reasonable and appropriate steps to ensure their welfare. The OIEG policy recognises the protected characteristics from the 2010 Equality Act and will provide this care regardless of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex and also of socioeconomic background.
- We aim to ensure all children:
  - Have a positive and enjoyable experience on OIEG Programmes in a safe and child-centred environment
  - Are protected from abuse whilst participating in our programmes

## Adult Responsibilities

All adults working with children on OIEG programmes have a duty to:-

- Understand, adopt, adhere to and implement the Safeguarding and Child Protections Policy
- Respect and promote the rights, wishes and feelings of all students
- Safeguard and promote the welfare of all students
- Conduct themselves in accordance with the OIEG Code of Conduct (this is displayed in classrooms and also in the staff handbook)

## Associated Policies

There are several policies associated with the Safeguarding and Child Protection Policy. These are listed below and will be made available to all adults working with children on OIEG programmes and be accessible at all the schools.

- Health and Safety
- First Aid
- Fire Safety
- Risk Assessment
- IT and the Internet including social media, email and the use of photography.
- Student Code of Behaviour
- Staff Code of Conduct
- Safer Recruitment
- Tackling Extremism & Radicalisation
- Whistle-blowing
- e-Safety (local)
- Disciplinary Procedure

## Policy Review

**When:** The policy will be reviewed in March of each year and in light of new or updated guidance from the UK Government or +other appropriate organisations

**How:** The OIEG Safeguarding Lead (David Wilkins) will monitor updates from the Department of Education and inform OIEG Senior Managers regarding Best Practice. Feedback is collected from students and staff and this will be collated, discussed and implemented.

**By Whom:** The OIEG Safeguarding Lead (David Wilkins) is responsible for this process.

## Roles and Responsibilities

OIEG meets its child protection responsibilities by ensuring that all staff are trained in Safeguarding, all senior staff has additional training qualifications and that all staff adhere to the Safeguarding and Child Protection Policy.

The OIEG Safeguarding Lead (David Wilkins) has completed training to a minimum of Advanced Safeguarding Training for Designated Leads (previously referred to as level 3) and the On-site Safeguarding Officers have completed training of Advanced Level Safeguarding Training for Designated Staff (previously referred to as level 2). This training is regularly updated. Appropriate training will also be ensured for all roles related to recruitment and selection.

The Safeguarding Lead has the full support of and access to Senior Management.

Responsibility for delivering or ensuring delivery is organized as follows:

<b>By whom</b>	<b>To Whom</b>	<b>Where</b>	<b>When</b>
OIEG Safeguarding Lead (David Wilkins)	Head Office Staff	OIEG Head Office	Ongoing
OIEG Safeguarding Lead (David Wilkins) Juniors Welfare Coordinator (Meg Over)	Centre Managers & Welfare Staff at Junior Centres	All Junior Spring and Summer Centres	March and June
Centre Managers / Welfare staff	Junior Teachers, ALs, support Staff	All Junior Spring and Summer Centres	March/April and June/ July/ August
Welfare Staff/Teachers	U18's at Junior Centres Easter and summer programmes	During student induction and ongoing in classes / on excursions	With each newly arriving student

## Under 18's Involvement

As part of 'Best Practice' all students will be made aware of the Child Protection and Safeguarding Policy and will be invited to make their own comments and contribution as appropriate during their induction.

## Code of Conduct

It is important that all adults working with children understand that the nature of their work and the responsibilities related to it, place them in a position of trust. At OIEG we aim to create a safe school culture by ensuring all adults working with children and young people follow a Code of Conduct. This Code of Conduct endeavours to:-

- assist staff working with children and young people to work safely and responsibly and to monitor their own standards and practice;
- set clear expectations of behaviour and codes of practice relevant to the role
- support employers in giving a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken;

## Power and Positions of Trust

As a result of their knowledge, position and/or the authority invested in their role, all people working with children, young people are in positions of trust.

A relationship between a person and a child or young person cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and adults. Where a person aged 18 or over is in a specified position of trust with a child under 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

This means that staff should not:

- use their position to gain access to information for their own or others' advantage
- use their position to intimidate, bully, humiliate, threaten, coerce or undermine children and young people.
- use their status and standing to form or promote relationships which are of a sexual nature, or which may become so.

## Propriety and Behaviour

There may be times, for example, when a person's behaviour or actions in their personal life come under scrutiny from the work environment, the local communities or public authorities. This could be because their behaviour is considered to compromise their position in school or indicate an unsuitability to work with children, young people. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour.

People in contact with children and young people should therefore understand and be aware, that safe practice also involves using judgement and integrity about behaviours in places other than the work setting.

This means that staff should not:

- Not smoke or drink alcohol whilst in the company of, or whilst responsible for, students.
- Behave in an aggressive, violent or forceful manner which would lend any reasonable person to question your suitability to work with children and young people or act as a role model

## Infatuations

Occasionally, a child/young person may develop an infatuation with a staff member. Staff should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach. In this situation a staff member who becomes aware that a child, young person is developing an infatuation, should discuss this at the earliest opportunity with a senior member of staff so appropriate action can be taken to avoid any hurt, distress or embarrassment.

This means that staff should not:

- Be in a one to one situation with the young person
- Encourage the obsession

## Sexual Contact

Staff should clearly understand the need to maintain appropriate boundaries in their contacts with children and young people. Intimate or sexual relationships between children/young people and the people who work with them will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.

Any sexual activity between an adult and the child or young person with whom they work will be regarded as criminal offence and reported accordingly. Additionally, this will always be a matter for disciplinary action.

Children and young people are protected by specific legal provisions regardless of whether the child or young person consents or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material.

There are occasions when a person may embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or adult at risk, and manipulate that relationship so sexual abuse can take place. Adults should be aware that consistently conferring inappropriate special attention and favour upon a child might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behaviour.

This means that staff should not:

- Have sexual relations with young people
- Any communication which could be interpreted as sexually suggestive or provocative – either verbal, letter, notes, email, text, calls or contact
- Talk about your own sexual relationships
- Make sexual remarks about the young person

Relationships should be professional, healthy and respectful at all times. Your language, demeanor attitudes and conduct all require careful thought when dealing with adolescents.

## Dress and Appearance

Staff should dress in ways which are appropriate to their role and this may need to be different to how they dress when not at work. People who work with children and young people should ensure they take care to ensure they are dressed appropriately for the tasks and the work they undertake. Those who dress in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations

Staff should wear clothing appropriate to the role:

- Not viewed as offensive, revealing or sexually provocative
- Does not distract, cause embarrassment or give rise to misunderstanding
- Is absent of any political or otherwise contentious slogan
- Is not considered discriminatory and is culturally sensitive

## Behaviour Management

- All children and young people have a right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour.
- Staff should not use any form of degrading treatment to punish a child or adult at risk. The use of sarcasm, demeaning or insensitive comments towards children and young people is

not acceptable in any situation. Any sanctions or rewards used should be part of a behaviour management policy which is widely publicised and regularly reviewed.

- The use of corporal punishment for children and young people is not acceptable
- Where a child may display difficult or challenging behaviour, a person must follow the behaviour policy outlined by their place of work, and use strategies appropriate to the circumstance and situation. The use of physical intervention can only be justified in exceptional circumstances and must be used as a last resort when other behaviour management strategies have failed.

## Physical Contact

There are occasions when it is entirely appropriate and proper for staff to have physical contact with children, but it is crucial that they only do so in ways appropriate to their professional role. The general culture of 'limited touch' should be adapted and staff should use their professional judgement at all times.

Physical contact should take place only when it is necessary in relation to a particular situation.

Some of these situations are:

- During certain activities such as drama, sports and outdoor activities
- When a child is in distress
- Personal Care
- For restraint and physical intervention
- Medical and First Aid

This means that staff should not:

- Use physical force as a means of punishment and discipline. The use of unwarranted physical force is likely to constitute a criminal offence.
- Never touch a child in a way which may be considered indecent
- Indulge in horse-play

## Communication with Children and Young People

Communication between children and young people by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones text messaging, e-mails, digital cameras, videos, web-cams, websites and blogs. Staff should not share any personal information with a child or young person and should not use their personal mobile to communicate with any young person or on a personal level take photographs/videos. A person should ensure that all communications are transparent and open to scrutiny.

This means that staff should:

- not give their personal contact details to children, young people, including their mobile
- inform the Centre Manager immediately if contacted by a young person on a personal mobile and only use equipment e.g. mobile phones, provided by organisation
- only make contact with children for professional reasons and in accordance with any organisation policy
- recognise that text messaging is not an appropriate way to respond to a child
- not use internet or web-based communication channels to send personal messages to a child/young person
- Not use a social network site to complain or criticize colleague/school/child etc.
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*(See also staff code of conduct and E-safety policy)*

## Child Protection Guidance

### How to Respond to Concerns

If you have concerns about a young person's safety or well-being, discuss your concerns with the on-site Safeguarding Officer. If you still have concerns you and/or your On-site Safeguarding Officer should contact the OIEG Safeguarding Lead (their name and contact details will be provided to you at the time of induction and their details can also be found on the OIEG website: [www.oxfordinternational.com](http://www.oxfordinternational.com)) who will have the appropriate training and expertise to support you and advise on the next stage. You should act swiftly. There should not be any time delay. If you cannot contact this person and you believe that a child may be in *imminent danger of abuse* you should contact the Police immediately.

### How to Respond to a Child Disclosure

A concern may come to light as a response of something a child says to you. Often, this disclosure can be made during casual conversation. If a child makes a disclosure to you:

- Listen to the information and accept what you hear without passing judgement or dismissing what you hear. Do not dismiss or trivialise what the student has told you. Stay calm. Be aware of your own reactions. Do not transmit shock, anger or embarrassment.
- Never enter into a pact of secrecy with the child. Assure them you will try and help but this may involve telling a more senior trained member of staff. Do not promise confidentiality but that the information will be treated with great care but reiterate you may need to share the information with a trained safeguarding person.
- Reassure and praise the child. Tell them you believe them and it is not their fault. Children rarely lie about abuse but they may have tried to tell others and not been heard or believed.
- Encourage the child to talk without leading questions. Do not put words into the child's mouth or make judgemental statements about any person. Keep your own responses short and simple and do not offer new information. Do not interrogate the child. Check you have understood what the child is telling you. Do not comment of the offender – it may be someone they love.
- Be aware the child may retract what they have told you, but it is essential to report what you have heard.
- As soon as possible afterwards (if possible during the conversation) make a detailed record of the conversation, including questions you asked. Do not add your opinion.
- **Immediately** after the meeting you should contact the Designated Safeguarding Lead (David Wilkins or Meg Over) and report the outcome of the meeting and produce the written record of the conversation.
- Take into account the child's age, their level of understanding, their culture and level of language.
- Confidentiality: you must never discuss issues with colleagues, family or friends. The information you have received must remain between yourself and the Designated Officer.
- Any information divulged must be on a need to know basis.
- Parents/Carers (including Group Leaders) of the child will always be informed of allegations of abuse made by a child *unless this puts the child or the subsequent investigation at risk* (e.g. if they are the subject of the allegation)

## Recording Information and Record Keeping

### Why?

- Clarifies the nature and extent of concerns
- Provides a clear record of development of concerns
- Identifies patterns of behaviour
- Assists any subsequent referrals
- Ensures consistency

### What?

- Signs and Indicators
- Disclosures
- Relevant contact with parents and or other agencies

### How?

- Factually - day, date, time place
- Give background information
- Record child's word verbatim
- Keep any initial notes
- Record action taken and the reasons

Secure provision is made for all records produced during any welfare discussions or disclosures at each individual school. These records are then transferred to OIEG in Greenwich where they are held for three years. There are copies of all documents or information which may have been sent to any authority or agency.

## Recognising Symptoms of Abuse

Although a child may make a disclosure of abuse to you, it is entirely possible that you will become concerned about the welfare of a child because of their behaviour or because you notice physical symptoms of abuse.

The four areas of abuse are outlined briefly in the table below: A more comprehensive appendix will be presented in all staff training with additional guidance and scenarios used for discussion and developing further awareness and understanding.

There are no absolute criteria on which to rely when judging what constitutes as significant harm. Consideration of the severity of ill-treatment may include the degree and extent the duration and frequency of all the four abuses.

## What is abuse and neglect?

These are forms of maltreatment – a person may abuse or neglect a child by inflicting harm, or failing to act to prevent harm. Children and young people may be abused by a family member or in an institution or residential or community setting; by those known to them or, more rarely, by a stranger.

Type of abuse	Definition	Indicators
Physical	May involve hitting, shaking, throwing, squeezing burning or scalding, poisoning biting, drowning, suffocating or otherwise causing physical harm to a child.	<p>There can be a lot of overlap between the signs and symptom of one type of abuse and another.</p> <p>Indicators of abuse could be:</p> <ul style="list-style-type: none"> <li>• Unexplained cuts, bruises, marks, abrasions, burns</li> <li>• Unwell</li> <li>• Distress</li> <li>• Self-harm or attempts at suicide</li> <li>• Withdrawn</li> <li>• Isolated</li> <li>• Aggressive</li> <li>• Overtly sexual behaviour</li> <li>• Unwashed</li> <li>• Bed-wetting</li> <li>• Clothes unchanged</li> <li>• Not taking part in activities</li> <li>• Not eating</li> </ul>
Emotional	Is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the emotional development of the child? It may involve conveying to children they are worthless, inadequate, unloved and threatening severe punishment, preventing the child from taking part in normal activities and/or abandonment. Also verbal abuse, taunting and shouting. It may take the form of text or cyberbullying.	
Sexual	Young people are abused by adults, those in a position of trust, adolescents or other young people who use them to meet their own sexual needs. This involves sexual intercourse, attempted sexual intercourse, fondling, and any penetrative act (oral/anal) intercourse, masturbation and exposure to pornographic material. 'Grooming' a child in preparation for abuse, including via the internet, is a form of sexual abuse.	
Neglect	Is persistent failure to meet a child's basic physical and /or psychological needs. This can include not providing appropriate food, clothes, warmth and medical care or leaving a child unsupervised and failing to protect them from physical or emotional harm.	

### Handling allegations of abuse against staff:

If an allegation is made against a member of OIEG staff, the quick resolution of that allegation is our priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be eradicated.

- Any allegation of abuse by a member of staff should be reported to the On-site Safeguarding Officer (or their named Deputy) straight away. In the absence of the Designated Person or their Deputy, or, in cases where the Designated Person or their Deputy are the subject of the allegation or concern, allegations should be reported to the OIEG Safeguarding Lead. In all cases, the OIEG Safeguarding Lead OIEG will be the Case Manager going forward.
- The OIEG Safeguarding Lead will then immediately contact their Local Safeguarding Children Board to discuss the case with the Local Authority Designated Person (LADO) and decide on strategy going forward. The OIEG Safeguarding Lead will then inform the accused person about the allegations as soon as possible after consulting the LADO.
- In response to an allegation staff suspension will not be the default option. An individual should only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification should be recorded by the school and the individual notified of the reasons.

- Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or malicious should not be referred to in employer references.

*(See also Disciplinary Procedure in staff handbook)*

### **Additional Guidance for all staff:**

Also, remember to protect yourself from false allegations of abuse. Try to ensure that one-to-one interviews are in rooms with glass doors, record and have countersigned all records of conversations and never offer students lifts in your own vehicles. We always aim to be friendly with students but that can mean that professional and private boundaries can get blurred. Be particularly careful about sharing jokes, use of inappropriate language use and physical contact.

Pupils that are found to have made malicious allegations are likely to have breached school behaviour policies. The school will therefore consider whether to apply an appropriate sanction, which could include permanent exclusion (as well as referral to the police if there are grounds for believing a criminal offence may have been committed).

### **Handling allegations of abuse made against other students**

Where the allegation of abuse is made by a child against a student who is an adult, again, suspension will not be the default option. The student should only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification should be recorded by the school and the individual notified of the reasons.

At this stage, Agents may only be informed that the student has been suspended with the permission of the student. If the student briefs the agent themselves and the agent seeks clarification from us then appropriate details may be provided at this time.

Allegations that are found to have been malicious will be removed from all school records and will not be referred to in reference requests from external agencies.

'Abuse is not just an adult phenomenon' and it is not something that is necessarily committed only by an adult. Children can pose a threat to other children, either physical or sexual; and abuse may be committed

Where we have reason to suspect that a child may be suffering, or is likely to suffer, significant harm as a result of the actions of another child (or children), the response will be considered in the light of all the relevant facts and circumstances. The On-site Safeguarding Officer and/or the OIEG Safeguarding Lead will discuss the circumstances and relevant senior pastoral colleagues will be involved as appropriate. Additionally, the advice of the LADO will be sought at a very early stage. Any disclosure, allegation or concern will be referred in the usual way to the LADO.

In the event of any disclosure about student on student abuse, all the children involved, whether alleged perpetrator or victim, must be treated as being 'at risk' and this needs to inform the school's handling of the situation.

### **Group Leaders:**

OIEG have formal agreements in place with our agents to ensure that suitability checks have been done on all adults accompanying under 18's. In addition to this, we require that all Group Leaders are made aware of this safeguarding policy and our practices and upon arrival provide a signed declaration to us that they understand these.

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Should a concern be raised or an allegation of abuse made against a group leader it should be reported to the On-site Safeguarding Officer who is the on-site Safeguarding Lead who will then immediately raise this with the OIEG Safeguarding Lead. Should this person not be available guidance should be sought for the Local Authority Designated Officer via the local Safeguarding Board.

If you have any concern about the conduct of a Group Leader or other adult accompanying an Under 18 student discuss your concerns with the On-site Safeguarding Officer (or their named Deputy) straight away. If you still have concerns you and/or the On-site Safeguarding Officer should contact the OIEG Safeguarding Lead.

### Safe Recruitment:

All current holders of roles involving responsibility for or substantial access to under 18s, and all new appointees to such roles, will have appropriate suitability checks, for example with the Disclosure and Barring Service (in England and Wales) or Protecting Vulnerable Groups Scheme (in Scotland) or Access NI (in Northern Ireland), or Police 'Certificate of good conduct' (outside the UK).

In addition:

- At least 2 references will be asked for and if possible one reference is followed up by phone
- all gaps in CVs must be explained satisfactorily
- proof of identity and (where applicable) qualifications is required
- reference requests will ask specifically whether there is any reason that they should not be engaged in situations where they have responsibility for, or substantial access to, persons under 18
- appropriate suitability checks are required prior to confirmation of appointment
- a declaration of convictions is required

Potential applicants will be informed of all suitability requirements *pre-application*.

*(See also Safer Recruitment Policy)*

### Accommodation:

All host accommodation for young people and vulnerable adults is checked to ensure that all residence staff, homestay providers, landlords, landladies and all other residents staying in the home are suitable to house our students. In addition, we conduct a DBS check on the main care giver in all homestays.

OIEG ensures that appropriate procedures and monitoring is in place for all accommodation. In addition, we ensure that – where appropriate - a curfew has been agreed with Group Leaders residence staff, homestay providers, landlords or landladies.

If you have any concerns about the accommodation of an Under 18 student discuss your concerns with the On-site Safeguarding Officer (or their named Deputy) straight away. If you still have concerns you and/or the On-site Safeguarding Officer should contact the OIEG Safeguarding Lead (David Wilkins).

## Excursions and activities:

OIEG provides a suitable leisure programme for students where this has been booked with us and will have made clear - in writing to the person making the booking at the time - that if 'out of hours' activities and excursions are *not* booked directly with us does this does not absolve us from our Duty of Care towards our students during their delivery.

If a leisure programme has been booked with us, OIEG staff accompanying the group will take particular care when supervising students in the less formal atmosphere of an excursion or out of school activity and the DfEE adult/under 18 staff to student ratios are observed or exceeded. In addition:

Risk assessments are completed on all out of school activities.

- When working with children/juniors, consent is always gained from parents/carers or a group leader (who has parental consent to act as with 'in loco parentis' status).
- During school activities that take place off-site or out of school hours, a more relaxed discipline or informal dress and language code may be acceptable. However, staff remain in a position of trust and need to ensure that their behaviour cannot be interpreted as seeking to establish an inappropriate relationship or friendship. Please note that any sexual relationship between an under 18 year old student and a person in a position of authority is illegal.
- Where out of college activities include overnight stays, careful consideration needs to be given to sleeping arrangements. Students, staff and parents should be informed of these prior to the start of the trip.
- Health and Safety arrangements require members of staff to keep colleagues/employers aware of their whereabouts, especially when involved in an out of school activity.

## Other Safeguarding issues:

Safeguarding covers a range of issues. We should do everything possible to ensure that students feel safe at all times.

### Child sexual exploitation

(CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. However, victims may carry two phones or one phone and two SIM cards.

If you suspect a child is at risk of CSE or that this has already taken place this should be reported to the Designated Person or their Deputy, or, in cases where the Designated Person or their Deputy are not available, to the OIEG Safeguarding Lead.

## Peer on Peer Abuse / Teenage Relationship Abuse

Staff and other adults should recognise that children and young people are capable of abusing their peers. OIEG takes any concerns of this nature very seriously and concerns should be raised in the same way as other concerns, directly to the Designated Safeguarding Lead (David Wilkins) or a deputy. Peer on peer abuse can take the form of bullying (including cyber bullying), sexting and any other form of sexual or physical abuse. Gender based issues can occur – for example girls being sexually touched / assaulted / photographed or boys being subject to initiation / hazing type violence.

## Female genital mutilation (FGM)

Female genital mutilation includes procedures that intentionally alter or injure the female genital organs for non-medical reasons. It is a surprisingly common form of abuse in the UK – over 1700 victims were referred to specialist clinics in the UK during the last 2 years. Many more cases are believed to go unreported.

OIEG takes these concerns seriously and staff will be made aware of the possible signs and indicators that may alert them to the possibility of FGM.

A girl or woman who's had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

Any indication that FGM is a risk, is imminent, or has already taken place should be reported to the Designated Person or their Deputy, or, in cases where the Designated Person or their Deputy are not available, to the OIEG Safeguarding Lead.

## Breast Ironing

In this procedure hot objects, including stones and hammers are used to pound and beat girls' breasts to stop them growing. In the belief that it makes them less desirable to men and discourages pre-marital pregnancy. Any concerns about this affecting anyone at OIEG should be directed to the OIEG Safeguarding Lead.

## Child drug exploitation

Gangs pose a significant threat to vulnerable adults and children who they rely on to conduct and / or facilitate this criminality. Exposure to gang exploitation has the potential to generate emotional and physical harm. A more recent trend identified is the targeting of adults with mental health problems. The use of mobile phones to maintain 'deal lines' between customers and gang members is a key feature. Although CSE is not the driving factor there are clear links between drug exploitation and CSE. Girls who are being exploited to hold and deal drugs are vulnerable to becoming more accessible to gang members wishing to sexually exploit them. Any concerns should be directed to the OIEG Safeguarding Lead.

## Honour based violence

This is a form of domestic abuse which is perpetrated in the name of so-called 'honour'. The honour code it refers to is set at the discretion of male relatives and women who do not abide by the rules may then be punished for bringing shame on the family. For example HBV might be

committed against people who become involved with a boyfriend / girlfriend from a different culture or religion, want to get out of an arranged or forced marriage, wear clothes or take part in activities that might not be considered traditional within a particular culture. Women and girls are the most common victims of HBV but it can also affect men and boys. Any concerns should be directed to the OIEG Safeguarding Lead.

## Forced marriage

A marriage where one or both of the parties is married without their consent or against their will. It is illegal in the UK and is recognised as a form of violence against women and men, girls and boys and a serious abuse of human rights. The pressure put on people to marry against their will can be physical (including threats and actual physical or sexual violence) or emotional and psychological. Financial abuse (taking or not giving money) can be a factor. The Forced Marriage Unit has been set up by the FCO and Home Office to help stop forced marriages or to help people leave a marriage they have been forced into.

Forced Marriage Unit

[fm@fco.gov.uk](mailto:fm@fco.gov.uk)

02070080151

Any concerns should be passed immediately to the OIEG Safeguarding Lead

## Anti-modern slavery

It is estimated there are many thousands of people in modern slavery in the UK today. Most commonly people are trafficked into forced labour in industries such as agriculture, construction, hospitality, manufacturing and car washes. Many women and girls are trafficked for sexual exploitation or end up in domestic slavery. The Modern Slavery Act 2015 is designed to tackle slavery in the UK. Any concerns about students should be passed to the DSL (David Wilkins)

## Fabricated illness

Fabricated or induced illness is a rare form of child abuse. It occurs when a parent or carer (usually the child's biological mother) exaggerates or deliberately causes symptoms of illness in the child. It is also known as Munchausen's syndrome by proxy (not to be confused with Munchausen's syndrome where a person pretends to be ill or causes illness or injury to themselves). If you suspect that someone you know may be fabricating or inducing illness in their child you should not confront them directly, but led the DSL (David Wilkins) know immediately

## Extremism & Radicalisation

The Counter-Terrorism and Security Act places a duty on services providers to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

Radicalisation is a form of abuse and is responded to from within our Safeguarding procedures. As a group of companies, OIEG values:

- Democracy
- The rule of law
- Individual liberty
- Mutual respect and tolerance of different faiths and beliefs

All OIEG staff receive training to both support their awareness of the Prevent Strategy and their ability to identify and support individuals who are vulnerable to being drawn into terrorism. All OIEG settings will co-operate fully their Local Authority 'Channel Panel' in the carrying out of its

functions and with the police in undertaking the initial assessment as to whether a referral is appropriate.

*See also the Tackling Extremism & Radicalisation policy*

### **Bullying:**

Teachers should ensure that all students have an opportunity, during tutorial time, to discuss bullying: its causes, student strategies to deal with it and the College Policy on it. Increasingly bullying is about cyber-bullying and there are tutorials and e safety advice to help students deal with this too.

If you do become aware of a case of bullying inform Designated Person or their Deputy, or, in cases where the Designated Person or their Deputy are not available, to the OIEG Safeguarding Lead.

Ideally we will use 'Restorative Justice' as a way of dealing with bullying rather than traditional Disciplinary methods available. Restorative Justice dispenses with the notion of victims and perpetrators and focuses on solutions to the problem based on mutual understanding and shared perceptions.

If Restorative Justice fails we will refer to the school's Anti-Bullying Policy. However, it is worth pointing out that it is not possible to exclude a student permanently without clear evidence that bullying has taken place.

*(see bullying policy)*

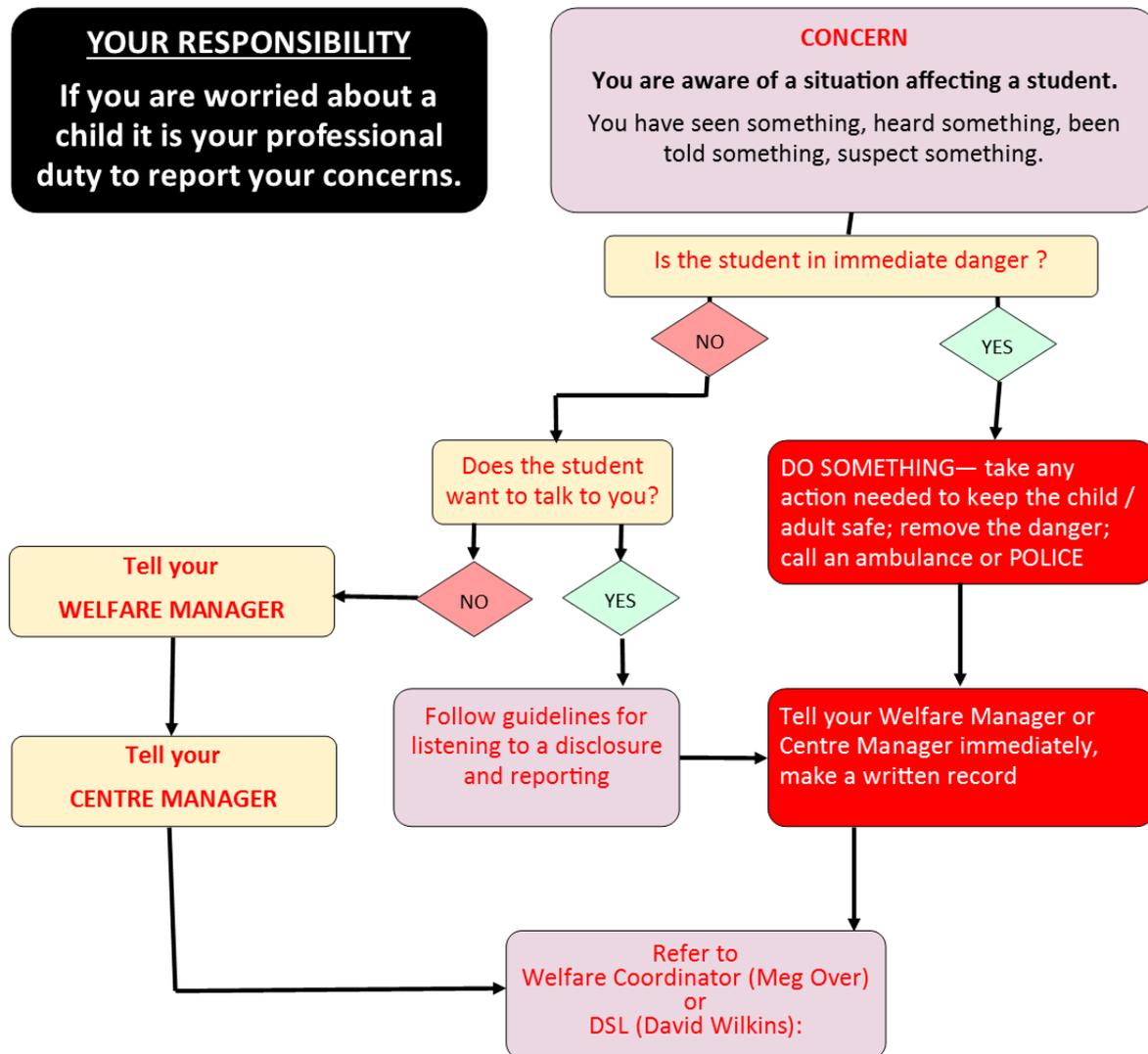
### **E-Safety:**

New technologies have become integral to the lives of children and young people and adults in today's society, both within schools and in their lives outside school.

The use of these exciting and innovative tools in school and at home has been shown to raise educational standards and promote pupil / student achievement. However, the use of these new technologies can put young people at risk.

Each setting within the OIEG group have a specific e-safety policy that should be read in conjunction with this Safeguarding Policy. *(See also e-Safety Policy)*

## APPENDIX A: How OIEG deals with Safeguarding Incidents



Oxford International Designated Safeguarding Lead: David Wilkins (Deputies Robin Fry, Daniel Tourt, Debra McGlone). Whistleblowing: Robin Fry

APPENDIX B: Who to contact in centres

# Keeping Safe

You have the right to be safe while you are at our summer school. If you don't feel safe, you are worried about something or are concerned about someone else come speak to:

- Welfare Manager—.....
- Centre Manager—.....

If you do not want to talk to someone at your centre you can call our emergency number:

**+44(0)203 318 300**

**Also you can always call:**



## APPENDIX C: CAUSE FOR CONCERN FORM

<b>Date</b>	
<b>Student first name</b>	
<b>Student family name</b>	
<b>M/F</b>	
Date of Birth	
Nationality	
Group / Individual	
Student ID	
<b>Name of person noting concern</b>	
<b>Role / connection with school</b> <i>(for example teacher / AL ?)</i>	
<b>Date and time concern noted</b>	
<b>Location</b> <i>(please be specific)</i>	
<b>Concern</b> <i>(please give as much detail as possible)</i>  If you are reporting a disclosure or an allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Please use the other side of this form and additional sheets to write more. Securely fix any extra sheets together.	
Signed	

Response to concern: this section to be filled in by the DSP  
Do parents / Group Leader / Agent / Homestay / Other need to be informed?

response	By whom (full name)	When (time and date)