

Oxford International English Schools: Safeguarding and Child Protection Policy

Terminology

OIEG is the Oxford International Education Group (referred to in this document as OIEG). The English Language schools are 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 is the requirement for everyone to take reasonable care in any situation in which harm to someone else could be foreseen.

Higher Duty of Care is 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 is 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 for the children and young people on OIEG programmes. As a minimum, this person has completed Specialist Safeguarding Training for Designated Leads (previously referred to as level 3). The OIEG Safeguarding lead is Robin Fry. He is supported by the Designated Deputy Lead (Laura Guga-Voyce) and OIEG Designated Safeguarding Leads for each of the 3 year-round schools (Clare Ahern, Dan Saatcioglu and Nic Starkey).

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 Specialist Safeguarding Training for Designated Lead (former level 3). This person will have a named Deputy who will also have completed Specialist Level Safeguarding Training as a minimum. Currently these are: Dan Saatcioglu and Sarah

Partington (Brighton), Clare Ahern, Ella Hoyland and Beatrice Bartus (Oxford) and Nic Starkey and Elaine Kniveton (Greenwich).

Statement

OIEG is committed to protecting students from harm or maltreatment and promoting the welfare of children. This policy is written with regard to the following documents:

- *'Keeping Children Safe in Education'* (September 2021)
- *'Working Together to Safeguard Children'* (December 2020)
- *'What to Do If You're Worried a Child Is Being Abused'* (March 2015)
- The Children Acts 1989 and 2004
- The Education Act 2002
- Counter Terrorism and Security Act 2015
- The revised Prevent Guidance (April 2021)
- Information Sharing (July 2018)

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 of how to respond to a student who may tell of abuse
- ensure children in our care, their parents/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 Local Authority Designated Officer (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 / Multi-Agency Safeguarding Hub (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 Disclosure and Barring Service (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 internally and are mandatory reading 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. Regular safeguarding refresher CPD sessions will take place for school staff.

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, sex/gender (including 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 Protection 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 continually reviewed in the light of new or updated guidance or recommendations from the UK Government or other appropriate organisations, changes to staff or in response to relevant issues. The policy is formally reviewed in March of each year.

How: The OIEG Safeguarding Lead (Robin Fry) 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 (Robin Fry) is responsible for this process, with the addition of input from the senior management staff and the Compliance team, and feedback from the teaching body.

Policy availability & formats

The policy is available upon request to anyone and a summary of the policy can be found on the company website. Detailed references to the policy and practices adopted are also listed in dedicated safeguarding sections of the Group Leader and students' welcome packs, handbooks, and are covered in the inductions and information provided to all partners, contractors and visitors.

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 (Robin Fry) has completed training to a minimum of Specialist Safeguarding Training for Designated Leads (previously referred to as level 3) and the On-site Safeguarding DSLs have completed a minimum of Specialist Safeguarding Training for Designated Leads. In addition to this each site will have a minimum of one Deputy Safeguarding Officer who is also Specialist Safeguarding Trained. All other OIEG staff are trained to Advanced (former level 2). All training is completed at the induction stage of any appointment and refreshers and updates are carried out as required and stipulated on the completion certificates. This training is regularly updated. Prevent awareness training is also provided at the induction stage as a separate training completed by all OIEG staff. The Safeguarding Lead has the full support of and access to Senior Management.

Responsibility for delivering or ensuring delivery is organised as follows:

By whom	To Whom	Where	When
OIEG Safeguarding Lead (Robin Fry)	Senior Management Teams	OIEG Schools, pathways colleges	Ongoing
Senior Management Teams (Local DSLs)	All centre staff - Tutors/Teachers/Activity Leaders/Support Staff	OIEG Schools, pathways colleges	Ongoing

DSL for Juniors (Tom Dawtrey)	Junior Programme Staff	All OIEG Spring and Summer Centres	March/April and July
Local DSLs and Student Services Team	Homestay families	Host meetings & Invitation seminars	When appropriate
Welfare Staff/Teachers	U18s at OIEG schools colleges and summer programmes	During student induction	With each newly arriving student

OIEG Safeguarding Committee

The OIEG Safeguarding committee is set up to share best practice and align all training and practices across the group. Chaired by the Group DSL (Robin Fry) and attended by the Compliance Director (deputy Groups DSL) and all local DSLs (Principals in EFL & College Directors in Pathways). Meeting quarterly the committee reviews:

- Legal updates in safeguarding
- Roles and responsibilities
- Training requirements
- Policy review
- Best practice
- Improvements in provision

Under 18s 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 employees 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 their work environment, local community 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 and 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:

- 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 contact 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
- engage in any communication which could be interpreted as sexually suggestive or provocative – either verbal, letters, notes, email, text, calls or contact
- talk about their own sexual relationships
- make sexual remarks about the young person

Relationships should be professional, healthy and respectful at all times. 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 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 inappropriate could render themselves vulnerable to criticism or allegations.

Staff should wear clothing appropriate to the role which:

- is 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 or young people, including their mobile
- inform the DSL immediately if contacted by a young person on a personal mobile and only use equipment e.g. mobile phones, provided by the 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 about or criticise colleague/school/child, etc.

(See also Staff Code of Conduct and E-safety Policy)

Transport

The school has written confirmation from all transport providers that their drivers have full DBS checks.

Favouritism and Gifts

Teachers and other staff should make sure they treat all students equally so as to avoid the

perception that they have “favourites”.

In the EFL context it is highly likely that students will present teachers or other staff with gifts at the end of their course. Any attempts by students to give gifts during their course rather than at the end should be avoided, as this could be perceived as bribery. Further guidance on gifts can be found in the Staff Code of Conduct.

Whistleblowing

Staff are **legally obligated** to inform management of any concerns related to staff not following the Code of Conduct. They will not be penalised for this and the reporting of any concerns will remain confidential.

During their induction, students are informed of the pathway for reporting inappropriate adult behaviour and informed they must do this if they have any concerns, without fear of any repercussions.

The NSPCC Whistleblowing Helpline is given to students, and is clearly on display on various noticeboards throughout the school.

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 on site. 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) 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, reiterating that 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 on 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 contact the Designated Safeguarding Lead (Nic Starkey or deputy) 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 of the child (including Group Leaders) 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 significant harm. Consideration of the severity of ill-treatment may include the degree, extent, duration and frequency of all four types of abuse.

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"> • Unexplained cuts, bruises, marks, abrasions, burns • Looking unwell • Signs of distress • Self-harm or attempts at suicide • Withdrawn manner • Isolation • Aggressive behaviour • Overtly sexual behaviour • Unwashed • Bed-wetting • Clothes unchanged • Not taking part in activities • Not eating
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 that they are worthless, inadequate and unloved as well as threatening severe punishment, preventing the child from taking part in normal activities and/or abandonment. It may take the form of text or cyberbullying and also verbal abuse, taunting and shouting.	
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), 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 Partnership 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.

Students 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 OIEG 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 the 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 18s. 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.

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 Partnership.

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.

Visitors and Contractors

All visitors must sign into reception upon arrival, and, after explaining the Information for Visitors document, the reception desk will provide them with a visitor lanyard and badge.

All visitors must be supervised at all times and never left unattended. They must also sign out when leaving the premises.

Safer 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 all references are followed up
- 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*)

Recruiting staff with delayed DBS checks

Occasionally OIEG may employ staff without following this procedure-; this is unusual but there are clear procedures in place which will be followed in cases where satisfactory documents are not returned before employment begins. These documents and the procedures can be found in Appendix D.

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, a DBS check is conducted on the main care giver in all homestays.

Homestay provider checks include an inspection of the property by a member of the local OIEG or 3rd party team and aim to ensure:

- Living conditions and facilities provided are to standard and clean
- That meal requirements, nutritionally filling and balanced can be provided and are understood
- That while there are appropriate security measures in the property (keys, locks etc.) that no security cameras (if installed) are in personal areas (e.g., bathrooms and bedrooms)
- There are fire alarms and smoke detectors appropriately placed in the property (a fire risk assessment is conducted with host)
- That accommodation is generally supported on main travel routes and on average no more than 30-40 mins travel away from the school

For all junior groups' accommodation is provided in twin or triple options and no students under the age of 16 may stay with a homestay provider for more than 28-days.

Where OIEG works with external homestay providers, these companies have their own safeguarding policies in place to ensure the safety of students.

OIEG ensures that appropriate procedures and monitoring are 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 Local DSL (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 (Robin Fry)

Excursions and activities:

OIEG provides a suitable leisure programme for students where this has been booked with us and it

will have been 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, this does not absolve us from our Duty of Care towards our students during its 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 'in loco parentis').
- 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-school 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 is 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 (Nic Starkey) 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.

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 has undergone 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

02070080151

Any concerns should be passed immediately to the OIEG Safeguarding Lead.

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 (Nic Starkey)

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 inform the DSL (Nic Starkey) immediately.

Extremism & Radicalisation

The Counter-Terrorism and Security Act places a duty on service 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 addressed 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 schools will co-operate fully with 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 School Policy on it. Increasingly, bullying takes place online (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 is 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. 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 should be noted that it is not possible to exclude a student permanently without clear evidence that bullying has taken place.

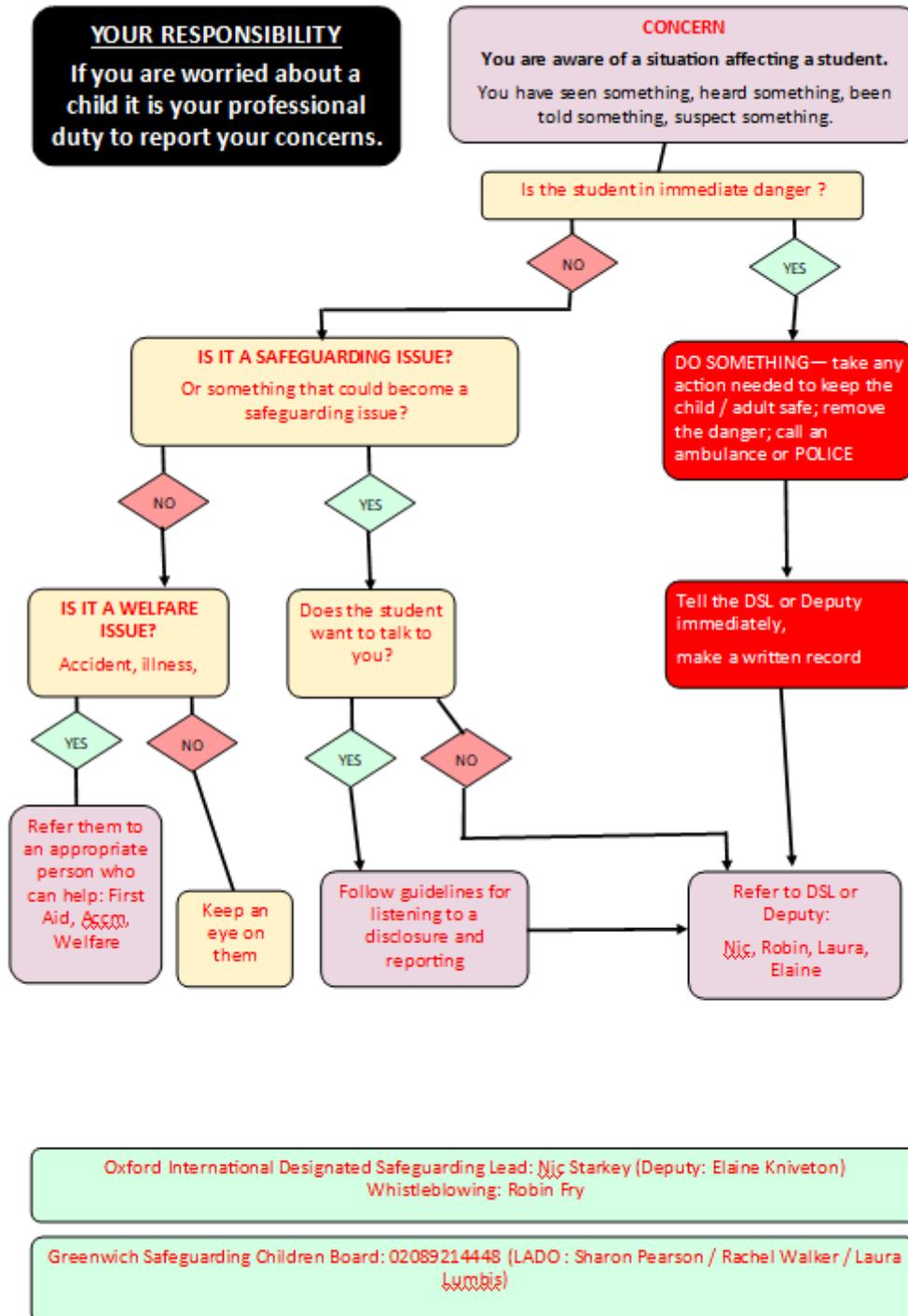
(see Bullying policy)

e-Safety

E-safety and the safeguarding of students online is covered in a separate policy *Online Safeguarding* and should be read in conjunction with this policy. The key tenets of which are summarised below:

- Online grooming
- Online radicalisation
- Online and cyber bullying
- Online child sexual exploitation
- Safer online and best practice

APPENDIX A: How OIEG deals with Safeguarding Incidents (Greenwich example)



APPENDIX B: Who to contact in the school (Greenwich example)

Keeping Safe



You have the right to be safe while you are at school. You also have a responsibility not to harm others.

If you don't feel safe or you are worried about something or have a concern about someone else, come and speak to one of us:



Shahad
Reception



Nic
Office / First Floor



Elaine
Teachers' room

.....
If you want to email us: safe@oxfordinternational.com

School Emergency Number: +44 7501 935 809

You can also call the Samaritans if you have personal problems and want to talk to someone.

Tel: 116123



APPENDIX C: CAUSE FOR CONCERN FORM

Date	
Student first name	
Student family name	
M	
Date of Birth	
Nationality	
Group / Individual	
Student ID	
Name of person noting concern	
Role / connection with school <i>(for example teacher / AL ?)</i>	
Date and time concern noted	
Location <i>(please be specific)</i>	
Concern <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)

APPENDIX D

SAFER RECRUITMENT: PENDING DBS CHECK POLICY AND RISK ASSESSMENT

The following is the OIEG Policy applicable across the company.

What if a Disclosure Check is not available before the start date?

New starters undertaking “regulated” activity must not commence employment in that role until all of the pre-employment checks (see 4 below) have been carried out, including the DBS Enhanced Disclosure check.

In the unlikely event that it has not been possible to obtain a satisfactory Disclosure before the individual is scheduled to commence employment and Oxford International believes that it is necessary for the individual to start work, the Principal has discretion to allow an individual to begin work pending receipt. However, the Principal can only allow the employee to commence work in the event that the individual is appropriately supervised AND that all the other statutory pre-employment checks have been completed.

In these circumstances, the Director of Studies or other hiring manager must complete the Pending DBS Disclosure Risk Assessment form and submit it to the Principal for approval. In the event that the Principal is away, the Schools Director may authorise that the employment can commence.

Pending DBS Check Risk Assessment

This form can be used to assist in assessing and recording the risks of allowing someone to start work before a DBS (Disclosure and Barring Service) check is received or where a DBS certificate shows relevant convictions or other relevant information. The risk assessment must be undertaken in accordance with the Policy on Employment of Ex-Offenders and Disclosure and Barring Service checks.

The completion of this risk assessment form is the joint responsibility of the hiring manager and the Principal. It must be authorised by the Principal before the person can start or continue working with children. This completed risk assessment form must be placed on the individual’s personnel file and made available to HR, audit, ISI and Ofsted inspections.

People may only work in these circumstances when all of the following applies:

- The appointment is necessary to allow the service provision to continue.
- In the case of children, the person has an enhanced DBS certificate issued within the last year by another body and the person provides the original enhanced DBS certificate to the appointing manager as evidence.
- All other Safer Recruitment checks are in place.
- An enhanced, DBS check has been applied for.
- The person has no unsupervised one to one contact with children.
- This risk assessment and risk management plan has been completed and signed off by the Principal

RISK ASSESSMENT FORM FOR EMPLOYEE STARTING WORK WHILST DBS IS PROCESSED					
ISSUED TO: INSERT NAME OF TEACHER			CONTACT DETAILS:		
Date		Location of work	INSERT NAME OF CENTRE		
Purpose	<p>To take up offer of employment with Oxford International Education Group (OIEG) whilst awaiting the result of a DBS check, it will be necessary for OIEG to process a DBS check with a List 99 clearance check. This checks information held under Section 142 of the Education Act 2002. The list is maintained by the Department for Children, Schools and Families (DCSF) and contains the details of those who are banned or restricted from working in an education setting. As this does not include a check against police records, the result is returned to the organisation usually within 3-5 working days and is therefore a useful interim check.</p>				
Work duties to be undertaken					
Working hours:					
Reason for Risk Assessment		Stringent recruitment procedures to protect young students who attend the College.			
CONSIDERATIONS (give details of risk eg likely contact with students whilst working alone)		RISK MANAGEMENT (give details of how risk can be minimised eg supervision of new employee)			
Signature of person assessed		Print Name		Date	
RA conducted by (signature of line manager)		Print Name		Date	
Signature of Authorised Official (who has agreed for work to be undertaken)		Print Name		Date	

PENDING DBS RISK ASSESSMENT PRO FORMA : TO BE COMPLETED BY APPOINTING MANAGER AND PRINCIPAL			
NAME OF CANDIDATE:		CONTACT DETAILS:	
DATE		LOCATION OF WORK	
PURPOSE	<p>To take up offer of employment with OIEG whilst awaiting the result of a DBS check, it will be necessary for OIEG to process a DBS check with a Barred List (List 99) clearance check. This checks information held under Section 142 of the Education Act 2002. The list is maintained by the Department for Children, Schools and Families (DCSF) and contains the details of those who are banned or restricted from working in an education setting. As this does not include a check against police records, the result is returned to the organisation usually within 3-5 working days and is therefore an essential interim check. This risk assessment is being carried to continue service provision while maintaining stringent safer recruitment procedures to protect young students who attend the school.</p>		
DUTIES TO BE CARRIED OUT			
INFORMATION REQUIRED		NOTES/CONFIRMATION	
1. Have any gaps, discrepancies or other areas of concern been fully explored?			
2. Have satisfactory references been obtained?			
3. Have qualifications been checked and verified?			
4. Has the candidate completed and signed a Suitability to Work with Children Declaration asking them to state any convictions, cautions, pending prosecutions or disqualifications?			
5. Have you seen and verified eligibility to work in the UK documentation?			
6. Barred List (List 99) Check must be carried out before they start work. Have you received confirmation that this has been done?			
7. Does the candidate already hold a DBS certificate from another organisation? If not, go to Q11.			
8. Who was the DBS certificate obtained by?			
9. Is the DBS certificate 'enhanced' level?			
10. The DBS certificate must indicate 'None recorded' against the ISA Children's Barred List information			
11. Has the candidate completed a new DBS application form? Confirm date that the form was sent to the HR Dept.			
12. Has the candidate been a resident outside of the UK?			
13. If yes, is the candidate able to produce the Police Check or DBS equivalent from other countries lived in? If no, is a Police Check or DBS equivalent from that country being sought?			

ASSESSING THE RISKS	
INFORMATION REQUIRED	NOTES/COMMENTS
Will the employee have unsupervised contact? The employee cannot have unsupervised one to one contact.	
What supervision is available?	
What level of risk is posed by the appointment?	High risk
	Medium risk
	Low risk
What safeguards can be implemented to reduce/remove any risk? Eg additional supervision, temporary changes of work location, temporary re-deployment to low risk role	
Risk assessment carried out by:	
Signed:	Date:
Is this person suitable to start work before the DBS is returned or to continue working under the conditions above? Yes/No	
Comments (Reason for decision)	
Risk assessment authorised by:	
Signed:	Date:

SAFEGUARDING PROCEDURES FOR EMPLOYING STAFF WITH DELAYED CHECKS: Teachers and Activity Leaders

Procedures for employing a member of staff at Oxford International Greenwich School if we are not able to follow our guidelines for Safe Recruitment, especially delayed suitability checks. The following process applies to teachers and Activity Leaders. The responsibility for following this process lies with the School Principal in the year Round schools

Our guidelines for safe recruitment are that:

- at least 2 references will be asked for and all references are followed up
- 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

For a number of reasons it may not always be possible to complete the recruitment checks in good time; for example in cases where recruitment and the starting date are very close.

We will always have:

- a full CV
- an interview with 2 people
- proof of identity with the right to work in the UK
- DBS checks (list 99 usually back in 24 hours)
- a suitability declaration

We will always attempt to get 2 appropriate references. However, where this is not immediately feasible we will consider employing the person as long as other checks and the interview do not identify any issues. Sometimes this may be because the referee is not immediately available.

Activity Leaders are always paired up, with either a Group Leader or another Activity Leader, and only very occasionally alone. In these cases it would always be after complete checks including references have been obtained.

Many of our teachers have either worked for us in the past (either for us or another part of the organisation), or have completed our Teacher Training courses. Whilst we still make the effort to obtain independent references, we can be reassured that the teacher is known to us.

In cases where there are new teachers and for whatever reason we have not managed to complete the recruitment process outlined above and referenced in our Safe Recruitment Policy, we will:

- check and confirm right to work, proof of identity and proof of address
- interview the teacher with 2 people. As well as the DoS there are a number of TEFLQ and experienced people in the building who can support this process, including Jane Stevenson, Lenka Karkoskova, Amanda Macgillvary.
- at interview go through the candidate's CV and ask them to explain any gaps.
- ask the candidate to complete a declaration of suitability.
- apply for a DBS check if the candidate is offered work (a list 99 check will usually be returned within 24 hours).
- ideally allocate the teacher to a class of over 18s but understand this may not always be possible.
- arrange a meeting on the first day between the teacher and one of the academic managers (or if this is not possible with a TEFLQ member of staff) to go through a lesson plan.

- arrange a meeting with Academic Management at the first break to discuss the class, plan and progress.
- arrange for a member of staff to meet the class quickly to see that everything is OK and check they are comfortable.
- arrange a meeting between the teacher and Academic Management or the Principal who will also talk to the class.

After the first day there will be a decision about whether to continue with the employment at a meeting between the Academic Management Team and Principal. If it is decided to continue there will be a daily meeting before class each day with the AMT and also a quick meeting with the class. This will continue until satisfactory references and a completed DBS check are received.

Welcome to OIEG Greenwich

Information for Visitors & Contractors

Your Safety and well-being during your visit is very important to us!

As a visitor we expect you to take care of the health and safety of yourselves and others:

Emergency- If the fire alarm goes off, please evacuate the building via the nearest assembly point. Do not re-enter until told to do so. Our assembly point is in front of the car park adjacent to the school

Fire- If you discover a fire, sound the alarm by breaking the glass on the nearest alarm.

Accidents- All accidents and incidents must be reported at reception where help and first aid can be administered.

Smoking- Smoking is not permitted on any part of the school premises.

Security- Please keep all your personal possessions with you at all times.

We are committed to the health, safety, welfare and well being of all our students, and to safeguarding them from harm. As a visitor/ contractor you are welcome at this school, but we ask you to support us by:

- Keeping to the professional boundaries of the purpose of your visit.
- Being mindful of your own behaviour and attitude towards the students.

Core contacts information

Brighton

Local DSL – Dan Saatcioglu, Principal dsaatcioglu@oxfordinternational.com

LADO – Darrell Clews

Local Authority Designated Officer
Performance & Safeguarding Service
Families, Children & Learning Directorate
Tel: 01273295643
Mobile: 07795335879
<https://www.bhscp.org.uk/>

Concerned about a child? Contact Front Door For Families: 01273 290400

FrontDoorForFamilies@brighton-hove.gov.uk

Greenwich

Local DSL – Nic Starkey, Principal nstarkey@oxfordinternational.com

The LADO role is shared between three part time workers:

Sharon Pearson's normal working hours are Monday and Tuesday 9-5.30pm and alternate Friday's 9-4.30pm. Sharon's work mobile is 07566 287417.

Rachel Walker's normal working hours are Monday 9-3pm, Tuesday 9-2.30pm and Friday 9-3pm. Rachel's work mobile is 07724 804943.

Laura Lumbis' normal working hours are Tuesday- Friday 9.30-2.30pm. Laura's work mobile is 07896 781040.

Oxford

Local DSL – Clare Ahern, Principal cahern@oxfordinternational.com

LADO	Alison Beasley
Assistant LADO's	Donna Crozier
	Sandra Barratt
	Lorna Berry

LADO.SafeguardingChildren@Oxfordshire.gov.uk or 01865 810603