

Safeguarding and Child Protection Policy

Last reviewed:	January 2023
Next review due:	January 2024
Reviewed by:	Group Operations and Compliance Director/Safeguarding Committee

Introduction

Oxford International Education Group takes the safeguarding of children and vulnerable adults very seriously and we are committed to embedding a culture where the wellbeing of our students is at the heart of everything that we do.

At Oxford International Education Group, safeguarding is everyone's responsibility.

All staff have the following responsibilities:

- Contribute to providing a safe environment in which all children can learn and flourish;
- Know what to do if a child tells you that he or she is being abused or neglected;
- Know what to do if you are concerned about the behaviour or conduct of an adult in the school/college;
- Manage the requirement to maintain an appropriate level of confidentiality;
- Refer any safeguarding concern about children or adults to the Designated Safeguarding Lead (DSL) or the Deputy DSL;
- Refer any safeguarding concern about the Principals/College Directors to the Group Compliance and Operations Director or the Managing Directors of Pathways/EFL
- Be aware of the process for making a referral to Children's Social Care and understand the role you might be expected to play in statutory assessments.
- Be aware of the process for making a referral to the Police and understand the role you may be expected to play in any criminal investigation

Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. All professionals should ensure that their approach is child centred: this means considering at all times what is in the best interests of the child.

Staff members must raise any safeguarding concerns with the designated safeguarding lead or deputies without delay.

If the designated safeguarding lead or deputies are not available, staff should not delay in taking appropriate action. Staff should consider contacting any of the DSL's or Deputies below.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care at MASH (Multi-Agency Safeguarding Hub) or equivalent (and if appropriate the police) is made

immediately. Anyone can make a referral to children's social care.

Staff members should ensure they are prepared for the referral with clear details of their concern and the child's name, DoB, address and contact details for parents/carers. There is no need for parental consent for referrals to statutory agencies.

Key contacts and agencies

Laura Guga-Voyce (Group Compliance and Operations Director)
lgugavoyce@oxfordinternational.com; 07741 632657

Designated Safeguarding Leads	Email	Division/Location
Gerrard McAteer Principal	gmcateer@oxfordinternational.com	Brighton School
Nic Starkey Principal	nstarkey@oxfordinternational.com	Greenwich School/OIEG Juniors
Clare Ahern Principal	cahern@oxfordinternational.com	Oxford School
Tom Dawtrey Operations Manager	tdawtrey@oxfordinternational.com	OI Digital Institute ELLT
Kamila Dolejsi	kdolejsi@oxfordinternational.com	OI Digital Institute Pre-Sessional English Language
Danyal Saatcioglu	dsaatcioglu@oxfordinternational.com	OI Digital Institute HE Programmes
Laura Mckenzie College Director	l.mckenzie@bangor.ac.uk	Bangor International College
Philip Moere College Director	philip.moere@dmu.ac.uk	De Montfort University International College
Corinne Wales College Director	C.wales@cdundee.ac.uk	International College of Dundee
Jacqui Ecoeur College Director	j.ecoeur@greenwich.ac.uk	University of Greenwich International College
Kevin Dunkerley College Director	k.dunkerley@bradford.ac.uk	University of Bradford International College
Deputy Safeguarding Leads		
Elaine Kniveton Director of Studies	ekniveton@oxfordinternational.com	Greenwich School
Ella Hoyland Operations Manager	ehoyland@oxfordinternational.com	Oxford School
Berta Jimenez Operations Manager	bjimenez@oxfordinternational.com	OIEG Juniors
Claire Hall College Manager	c.hall@bangor.ac.uk	Bangor International College
Ailen Geraghty English Lead	a.geraghty@dundee.ac.uk	International College of Dundee

Tracey March College Manager	t.march@bradford.ac.uk	University of Bradford International College
Leticia Debola College Manager	leticia.debola@dmu.ac.uk	De Montfort University International College
Edna Mohamud Safeguarding Officer	E.A.Mohamud@greenwich.ac.uk	University of Greenwich International College

Statutory agencies		
Front Door for Families (formerly MASH Brighton)	FrontDoorforFamilies@brighton-hove.gov.uk 01273 290400	Brighton
LADO Brighton	Darrel.Clews@brighton-hove.gov.uk https://www.bhscp.org.uk/local-authority-designated-officer-lado/ 01273295643	
MASH Greenwich	Mash-referrals@royalgreenwch.gov.uk 020 8854 8888 or 020 8921 3172	Greenwich
LADO Greenwich	childrens-Lado@royalgreenwich.gov.uk childrens-Lado@royalgreenwich.gov.uk.cjsm.net 020 8921 3930	
MASH Oxford	https://www.oxfordshire.gov.uk/business/information-providers/multi-agency-safeguarding-hub 0345 050 7666 Out of Hours Emergency Duty Team 0800833408	Oxford
LADO Oxford	lado.safeguardingchildren@oxfordshire.gov.uk 01865 810603	
MASH Bradford	Bradford MASH Multi Agency Safeguarding Hub 01274 435600 childrens.enquiries@bradford.gov.uk	Bradford
LADO Bradford	01274435600 LADO@bradford.gov.uk	
MASH Leicester	Children's social care (leicester.gov.uk) Duty and Advice Service: 0116 454 1004 Email: das-team@leicester.gov.uk	Leicester
LADO Leicester	Lado-allegations-referrals@leicester.gov.uk Email: Lado-allegations-referrals@leicester.gov.uk	
Dundee MASH (Inter Agency Child Protection Committee)	013872307999 Report a Concern Online Dundee Child Protection Committee (dundeeprotectschildren.co.uk)	Dundee
Bangor Child Protection (Gwynedd)	01758704455 01248353551 (out of hours)	Bangor/Gwynedd
Reporting abuse in education		
NSPCC Helpline	help@nspcc.org.uk 0800 136 663	
Female Genital Mutilation		
NSPCC FGM free phone helpline	fgm.help@nspcc.org.uk 0800 028 3550	

Whistleblowing	
OIEG Navex Helpline	oxfordinternational.ethicspoint.com 0800 102 6581
NSPCC Helpline	help@nspcc.org.uk 0800 028 0285 (8am-8pm Mon-Fri)

OIEG Safeguarding Committee

The OIEG Safeguarding committee is set up to share best practice and align all training and practices across group. Chaired by the Group DSL, Laura Guga-Voyce, and attended by 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

Terminology

OIEG is Oxford International Education Group (referred to in this document as OIEG) and is the trading name for a group of entities including Oxford International Education and Travel Ltd of which the 3 English Language Schools are a part, the OI Digital Institute (OIDI Ltd) and each International Pathway College. In this guidance we will refer to schools to mean both our Language Schools and our Pathways Colleges and we will use schools/colleges interchangeably. The guidance also covers the OI Digital institute where not specifically excluded.

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/vulnerable adults is:-

- protecting children/vulnerable adults from maltreatment;
- preventing impairment of children's (or vulnerable adults') mental and physical 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 (or vulnerable adults) to have the best outcomes.

Vulnerable Adults/Adults at risk of abuse or neglect – are adults aged 18 or over who:

- Have a need for care and support (whether or not the local authority is meeting any of those needs)
- Is experiencing, or is at a risk of, abuse or neglect
- As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.

Oxford International acknowledges that whilst international students may not always fall into the statutory definition of adults at risk, they may have additional vulnerabilities which we are committed to supporting throughout their studies with us.

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 Laura Guga-Voyce. She is supported by OIEG Designated Safeguarding Leads for each of the other divisions in the group as outlined on pages 2 and 3 of this guidance.

At each of our sites there is a senior member of staff who has the on-site responsibility for Child Protection in that centre. This person will have a named Deputy.

Current staff with Safeguarding and Child Protection responsibilities are listed above.

Statement

The safety and well-being of all our students is our highest priority. We recognise we have special responsibilities to ensure the safety of these students and 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 and vulnerable adults are paramount in all circumstances and that staff have a full and active part to play in protecting students from harm.

We acknowledge 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. Our policy aims to ensure that regardless of age, disability, gender, marriage, pregnancy, race, religion or beliefs, sex, sexual orientation or socioeconomic background, all students:

- Have a safe and positive experience on OIEG programmes in a safe environment; and
- Are protected from abuse whilst participating in our programmes.

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment;
- Preventing impairment of children's mental and physical health or development;
- Ensuring 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.

At Oxford International we are committed to safeguarding children and young people, and we expect

everyone who works with us to share this commitment. Reference to staff includes all those who work with us or on behalf of us regardless of their employment status, including contractors. Additionally, as already outlined above, this policy also covers adults at risk of abuse or neglect including international students who may not directly fall into the definition above but may need additional support.

Our policy is written with regard to *'Keeping Children Safe in Education'* (September 2022), *'Working Together to Safeguard Children 2018'* (last updated 1 July 2022), The Children and Young People (Scotland) Act 2014, the Safeguarding Guidance (Welsh Government 2022), the Revised Prevent Duty Guidance for England and Wales (April 2021), the Care Act 2014, the Data Protection Act (2018) and the UK General Data Protection Regulation.

Aims

- To promote and prioritise the safety and welfare of children, young people and adults at risk;
- To raise awareness of all adults working with children of the need to safeguard all children and of their roles and responsibilities in respect of identifying and reporting possible cases of abuse;
- To ensure all staff receive appropriate training;
- To emphasise the need for good communication between all members of staff in matter relating to safeguarding and child protection;
- To promote safe practice and challenge poor and unsafe practice;
- To ensure appropriate action is taken in the event of incidents, concerns of abuse and support is provided to the individual(s) who raise or disclose the concern;
- To ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored; and
- To prevent the employment of unsuitable individuals.

Key Safeguarding Facts

The safety and wellbeing of our students is our number one priority

Safeguarding and promoting the welfare of children and vulnerable adults is everyone's responsibility

We operate within a culture of openness and recognise and accept that abuse can happen in any organisation

We are a 'sharing organisation' All concerns should be reported

All concerns about a child or vulnerable adult (including signs of abuse and neglect) must be reported immediately to the Designated Safeguarding Lead (DSL) or, in their absence, to the Deputy Designated Safeguarding Lead (DDSL)

In the event that a child/vulnerable adult is in immediate danger or at risk of harm, a referral should be made to Children's/Adults' Social Care and/or the Police immediately

An allegation about another adult in school should be referred to the College Director or Principal

An allegation about the College Director/Principal should be referred to the MD of the Division or Group Compliance Director

Any concern or 'nagging doubt' about an adult or child should be shared with the DSL or College Director or Principal

This policy must be read alongside
'Keeping Children Safe in Education'/Care Act 2014/Relevant legislation
in Devolved Administrations

Teaching children and young people about safeguarding

Children and young people following Oxford International's programmes will be informed about how they can report concerns and what happens when they do as part of their induction.

Staff responsibilities

All staff have a duty to:

- Report any concerns they may have about the safety and/or wellbeing of students;
- Report any concerns they may have about the safety and/or wellbeing of other persons associated with Oxford International; and
- Report any safeguarding concerns about staff or anyone else associated with Oxford International.

All staff have a responsibility to read this policy carefully and to be aware of their role in these processes.

- Staff are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child or young person.
- Knowing what to look for is vital for early identification of abuse and neglect. If they are unsure, they should always speak to a designated safeguarding lead.
- All staff should be aware of the indicators of abuse and neglect. See Appendix 1.
- Any member of staff who has a safeguarding concern should follow the reporting and referral processes below.
- Where a staff member has concerns about poor or unsafe practices or potential failures in the organisation’s safeguarding processes, these concerns will be taken seriously and dealt with sensitively and appropriately. Staff may follow the Whistleblowing Policy or alternatively contact the NSPCC whistleblowing helpline. Contact details are provided above.

Training

All staff will receive appropriate training. Currently all staff receive Level 2 training as part of their induction via the IHASCO compliance training platform. This training is delivered on a 2 yearly basis for the duration of their employment with Oxford International. Staff at the Pathways Colleges are either enrolled on the Ihasco programme or receive training at the partner university (which is reviewed by the Group Compliance and Operations Director to ensure it meets the same standards as the Ihasco training). Short term contractors (e.g. activity leaders etc) receive safeguarding training tailored to their role either in a session at induction or in their contractor handbook.

Colleagues will also receive safeguarding and child protection updates (via email, staff meetings and the company intranet) as required and at least quarterly.

This policy is available to all staff via the intranet and by email on joining Oxford International. KCSIE Part One is also available on the intranet. Staff who work directly with children will be provided with KCSIE Part One and be required to confirm that they have read and understood the document. New staff will receive KCSIE Part One during induction.

Role of the DSL

Oxford International has appointed designated safeguarding leads at each of its locations. The DSL should take lead responsibility for safeguarding and child protection throughout the site/centre at which they are based.

This person should have the appropriate status and authority to carry out the duties of the post. They should be given the time, training and resources to provide advice and support to other staff on child welfare and child protection matters.

At Oxford International’s language schools and pathways centres (international colleges) the DSL is usually the Principal or College Director. At Head Office the DSL is the Group Compliance and Operations Director. At OIDI each Head of Division is trained to DSL level and we also have 2 DSLs for the Juniors Programmes. The DSL is supported by a deputy designated safeguarding lead.

Responsibilities of the DSL include:

Managing referrals

- Referring cases of suspected abuse to the local authority as required;
- Support staff who make referrals;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

Working with others

- Act as a source of support, advice and expertise for staff;
- Act as a point of contact with safeguarding partners; and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with the relevant agencies.

Raising awareness

- Ensure the organisation's child protection policy is known and understood; and
- Ensure the organisation's child protection policy and procedures are reviewed at least annually.

Training

The DSL and deputies will be released to attend the necessary enhanced training courses to enable them to carry out their role effectively.

The DSL and deputies should undergo training at an appropriate level to provide them with the knowledge and skills to carry out the role. This training should be updated at least every 2 years.

Their knowledge and skills should be refreshed regularly so that they understand and keep up with any developments in safeguarding and child protection.

Recordkeeping

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The records created may contain personal data. Such records will be kept secure in drives that only the DSL and deputies may have access to.

As of September 2022, each division has been provided with its own instance of the Safeguarding System – My concern. All safeguarding incidents are expected to be recorded through the Myconcern system (as well as following the relevant procedure at the Partner University for incidents occurring at Embedded Pathways Colleges). Relevant staff have been given training on Myconcern. For further training requirements you should contact the Group Compliance and Operations Director.

All records created will be managed in accordance with Oxford International's data privacy policies.

Safer recruitment

Oxford International is committed to practicing safer recruitment in checking the suitability of staff and contractors. Statutory procedures for checking the suitability of staff and volunteers who work with children are always followed. Oxford International's Recruitment and Selection Policy outlines the recruitment process and the checks carried out.

Monitoring and review

The Safeguarding Committee will ensure that the procedures set out in this policy and the implementation of these procedures are updated and reviewed regularly. The proprietorial Board is being updated on a monthly basis on the operation of these safeguarding arrangements.

Any safeguarding incidents will be followed by a review of these procedures by the DSL and report made to the Safeguarding Committee. The Oxford International Board may also be informed depending on the gravity of the incident.

Where an incident involves a member of the staff, the LADO will be asked to assist in the review. Any deficiencies or weaknesses in regard to safeguarding arrangements at any time will be remedied without delay.

The implementation of the new company wide safeguarding system will enable more accurate reporting and early detection of any low-level concerns which should further improve our ability to support children and vulnerable adults attending our schools and colleges.

OIEG carries out an annual review of this Safeguarding policy. This includes an evaluation of the extent to which these policies have been effectively implemented throughout the organisation. OIEG will remedy any deficiencies or weaknesses in child protection arrangements without delay and without waiting for the next policy review date, should any be necessary. Staff are invited to contribute to and shape safeguarding arrangements based on reflection and learning. Staff are invited to contribute to the review of this policy.

Procedures

What to do if you have a concern about a child, young person or vulnerable adult

All staff members have a responsibility to safeguard and promote the welfare of children/vulnerable adults studying on Oxford International programmes.

If a staff member has a concern about student or receives information that leads them to be concerned that a student has been harmed or is at risk of harm or their welfare is being compromised, they are required to act appropriately and immediately to ensure action can be taken to protect the student.

The member of staff must report the concern to the DSL or deputy.

Guidance on receiving a disclosure

The concern may be as a result of a disclosure from a student, a parent, agent or a third party or may arise due to behaviour that has caused the staff member to become concerned.

When listening to a child/vulnerable adult, staff must:

- Listen carefully to what the student is telling them without interrupting;

- Ideally listen to the student first and then make notes
- Not promise confidentiality
- Remain non-judgemental and keep an open mind
- Not ask leading questions or more questions than needed
- Be honest with the student and explain what will happen next
- Keep a sufficient written record of the conversation. All other evidence, for example, scribbled notes, mobile phones containing text messages, clothing, computers, must be kept securely with the written record

The DSL should be informed as soon as practically possible if the DSL is not involved in the initial report.

Staff should be able to reassure the victim(s) that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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)

When reporting a concern staff must:

- Record the information fully using the Cause for Concern Record Form or directly into the Safeguarding System (My Concern). See Appendix 2.
- If the form or the system are not accessible, staff must not delay in informing the DSL or deputy.
- Note the facts in the child/student's own words.
- Use the form to file a report in the Safeguarding System directly or pass the form via email marked confidential to the DSL or Deputy.

Asking for advice

Staff should remember the DSL is available to offer help, advice and guidance to staff and students. If staff have a concern or problem and are unclear how to proceed, they should ask for advice.

The DSL will seek advice from external agencies if they are unsure how to proceed with a child/vulnerable adult protection situation.

Action by the DSL

On receipt of a concern, the DSL will consider the appropriate course of action. Such action may include:

- Managing any support internally using Oxford International's own resources or the resources of a partner university, seeking advice from children's social care where required;
- A multi-agency referral; or
- A referral to statutory services.

The views of the child will be taken into account when considering the appropriate course of action but will not be determinative.

Where the concern relates to the welfare of a student who is aged 18 or over, the DSL will consider

whether it is necessary to refer such concerns to the Safeguarding Adults Board.

If it is decided that a referral is not required, the DSL will keep the matter under review and give ongoing consideration to a referral.

Making a referral

Where a child is suffering or is likely to suffer from harm, a referral to children's social care (and if appropriate the police) should be made immediately.

Children in need: A child in need is a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm: Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.

If a referral is made by phone, this should be followed up in writing. If the referral is made by someone other than the DSL, the DSL should be informed of the referral as soon as possible.

Once a referral is made, if a response is not received within one working day, the DSL or person making the referral will contact the appropriate agency to follow up.

For children or young people/vulnerable adults who are located overseas, and access Oxford International services online please contact the Group DSL (Laura Guga-Voyce) for advice on referrals. Colleagues should not let the location of a student stop them from reporting a concern!

Allegations against staff

Oxford International recognizes that there will be occasions when a student attending one of its programmes, or a parent or another person may make an allegation against a member of staff.

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical allegations of abuse should also be referred to the Police.

The term allegation refers to concerns reported or raised that might indicate a person has caused harm to a child, acted in a way that created potential serious risk to a child or would pose a risk of harm if they continue to work in regular or close contact with children in their present position or in any capacity.

This means it has been alleged that a member of staff has:

- Behaved in a way that has, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or
- Behaved in a way that indicates they may not be suitable to work with children.

All allegations against a member of staff must be dealt with as a priority without delay.

- Any allegation of abuse by a member of staff should be reported to the DSL immediately. 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 these cases, the OIEG Safeguarding Lead 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, and the individual notified of the reasons.

Children missing in education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in County Lines. It may indicate mental health difficulties, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's unauthorised absence and their local authority's 'children missing from education' procedures.

The high-level process across all OIEG schools is that a list of under 18's is kept by each of the schools and where a child fails to attend a timetabled session they are immediately contacted by the School/College to ensure that they are safe and well. If the student cannot be contacted, their UK guardian will be contacted to check that the student is well. If the UK guardian cannot confirm the student's whereabouts, a welfare visit to the student's accommodation is arranged/the situation is escalated to University DPO/Security.

Information sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. The Data Protection Act (2018) and GDPR do not prevent the sharing of information for the purposes of keeping children safe. School staff should, therefore, be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's Social Care. This includes the sharing of information without parental consent where there is good reason to do so, i.e., the risk of harm to the child will be increased.

Further details on information sharing can be found in Data Protection: Toolkit for Schools Guidance to support schools with data protection activity, including compliance with the GDPR Policy.

Disclosure and Barring Service

Oxford International will make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual if they had not left), and they believe the individual has:

- Engaged in relevant conduct in relation to children and/or adults.
- Satisfied the harm test in relation to children and/or vulnerable adults.

- Been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

Insurers

Oxford International will consider whether it is necessary to report a safeguarding incident to the relevant insurers and/or brokers.

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.

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. According to Section 16 of the Sexual Offences Act 2003, it is a criminal offence for a person aged 18 or over (e.g., teacher, activity leader etc) to have a sexual relationship with a child under 18

where that person is in a **position of trust** in respect of that child, even if the relationship is **consensual**. A situation where a person is in a **position of trust** could arise where the child is in full-time education and the person looks after children under 18 in the same establishment as the child, even if they do not teach the child.

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, demeanour attitudes and conduct all require careful thought when dealing with adolescents.

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 may be appropriate 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 always use their professional judgement. 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 horseplay

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, webcams, 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 number
- 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.

Favouritism and Gifts

Teachers and other staff should make sure they treat all students equally 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.

Low Level Concerns (including self-reporting)

The overarching aim of the Group's Low Level Concern Policy is to facilitate a culture in which the clear values and expected behaviours which are set out in our Code of Conduct are lived, constantly monitored, and reinforced by all staff. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines;
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in our Code of Conduct or other OIEG policy; and
- provide for responsive, sensitive, and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

What is a low-level concern, including those that are self-reports?

Self-reporting

From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct/other Oxford International policy, falls below the expected professional standards, or breaches this policy.

Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the school sees self-reporting as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

Low level concerns about an adult

From time to time an individual may notice behaviour, statements, or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a low-level concern.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for an allegation (see below). A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff Code of Conduct/other OIEG policy, including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the DSL.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating (including shouting or being verbally aggressive) or
- offensive language (including the belittling of children on their own or in front of peers).

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is

ultimately intended to enable abuse.

A Self-Report also falls under our Low-Level Concerns Policy and can be as described above.

What should I do if I have one?

Where a low-level concern (including self-reports) exists, it should be reported to the DSL or to the Principal/College Director as soon as reasonably possible in the same day as the incident (where the concern relates to a particular incident). If the DSL received the report, they must inform the Principal/College Director of all the low-level concerns and in a timely fashion (within the day). If the DSL and Principal are unavailable, the staff member with the concern should contact their Line Manager and the Chief Human Resources Officer. There must be no delay. Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, that concern should be shared with the DSL and/or Principal/College Director. Their employer will be notified about the concern by the DSL/College Director or Principal, so that any potential patterns of inappropriate behaviour can be identified.

How will my low-level concern be handled (including a self-report)?

The DSL will discuss all low-level concerns they receive with the College Director or Principal on the same day as the concern was raised. The College Director or Principal, in collaboration with the DSL, will, in the first instance, satisfy themselves that it is a low-level concern and should not be reclassified as an *allegation* and dealt with under the appropriate 'allegations' procedure (outlined later in this document). The circumstances in which a low-level concern might be reclassified as an allegation are where:

- a) the threshold is met for an allegation (see below);
- b) there is a pattern of low-level concerns which collectively amount to an allegation; or
- c) there is other information which, when considered, leads to an allegation.

The College Director or Principal is the ultimate decision maker in respect of all low-level concerns; however, it is safe and best practice that they consult with the DSL and take a more collaborative decision-making approach. Where the College Director or Principal is in any doubt whatsoever, advice will be sought from the Designated Officer, if necessary, on a no-names basis. The College Director or Principal can also seek advice from the HR Business Partner, MD of Pathways or Group Compliance and Operations Director .

Having established that the concern is low level, the DSL or College Director or Principal as appropriate will first discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training, etc. The person to which the low-level concern relates **must** be informed of any concern raised about them *once all risk has been identified and assessed*. The person who has raised the low-level concern about their colleague will remain anonymous.

What records will be kept?

Where a low-level concern has been communicated, or a Self-Report raised by an individual about themselves, a confidential record will be kept in a school central file which logs all low-level concerns. When staff leave the school, any record of low-level concerns which are stored about them will be kept for a period of 10 years, and following this, reviewed as to whether or not that information needs to be kept.

Consideration will be given to:

- a. whether some or all the information contained within any record may have any reasonably likely value in terms of any potential historic employment or abuse claim so as to justify keeping it, in line with normal safeguarding records practice;
- b. or if, on balance, any record is not considered to have any reasonably likely value, still less actionable concern, and ought to be deleted accordingly

Retention is necessary to see whether any patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the Designated Officer.

No record will be made of the concern on the individual's personnel file unless either:

- a. the concern (or group of concerns) has been reclassified as an allegation; or
- b. the concern (or group of concerns) is sufficiently serious to result in formal action under OIEG's Grievance, Capability or Disciplinary procedure.

Specifically, if a referral is made to the LADO/other external agencies where the behaviour in question:

- a. had not originally been considered serious enough to consider a referral to the LADO but merited consulting with and seeking advice from them;
- b. is determined to meet the threshold of an allegation when considered with any other low-level concerns that have previously been raised about the same individual; or

then records relating to the behaviour will be placed and retained on the staff member's personnel file, whilst **also** being retained on the school central low-level concerns file.

References

Low Level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a Low-Level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the allegations threshold for referral to the Designated Officer and found to be substantiated, it should be referred to in a reference (see below).

Appendix 1

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.

Abuse is a form 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.

The four areas of abuse are outlined briefly in the table below.

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 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.	

Specific forms of abuse

Child-on-child Abuse / Teenage Relationship Abuse

Staff and other adults should recognise that children and young people can abuse 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 or a deputy. Child-on-child abuse can take the form of bullying (including cyber bullying), sexting and any other form of sexual or physical abuse.

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/College 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.

Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. The term "harmful sexual behaviour" (HSB) – has been widely adopted in child protection and is used in this guidance. HSB can occur online and/or face to face and can occur simultaneously between the two.

When considering HSB, both the ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there are more than two years difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example if the older child is disabled or smaller in stature. The DSL's at OIEG will have specialist training in HSB. Further resources relating to HSB area available in KCSIE Sept 2022 Annex B.

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.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, forced to shoplift or pickpocket, or to threaten other young people. It is important to note that the experience of girls who are criminally exploited can be

very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE also involves children and young people being coerced into moving drugs or money across the country; this is commonly referred to as County Lines.

County Lines usually occurs through engaging children into gangs and using them to carry money or drugs from urban areas to suburban and rural areas, market and seaside towns. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office [here](#).

[County Lines Toolkit For Professionals](#) - The Children's Society in partnership with Victim Support and National Police Chiefs' Council.

All staff should be aware of indicators which may signal that children are at risk from, or are involved with, serious violent crime. These can include but are not limited to: increased absence from school; a change in friendships or relationships with older individuals or groups; a significant decline in performance; signs of self-harm or a significant change in wellbeing; or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. More information can be found in KCSIE (2022), in the Home Office's '[Preventing youth violence and gang involvement](#)' and its '[Criminal exploitation of children and vulnerable adults: county lines guidance](#)'.

See Annex B of KCSIE for more information.

Honour Based Abuse (HBA) (including Female Genital Mutilation (FGM), Forced Marriage (FM) and breast flattening)

HBA includes all incidents or crimes which have been committed to protect or defend the honour of the community and/or the family, and commonly involve practices such as FGM, forced marriage and/or breast flattening. Abuse often involves a wider network of family or community pressure and therefore it is important to be aware of this dynamic and consider risk factors when deciding on action. If staff have a concern that a child may be at risk of Honour Based Abuse, they should alert their DSL immediately.

FGM

FGM is abuse that encompasses all procedures involved in the partial or total removal of female external genitalia and is illegal in the UK. Whilst all staff should speak to the DSL (or deputy DSL) with regards to any concerns about FGM, there is a specific legal duty on teachers under the FGM Act (2003) to report FGM. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, it is mandatory that the teacher **must** report this to the police using the telephone number 101.

Forced Marriage (FM)

Forcing a person into marriage is a crime in England, Wales and Scotland. FM is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools). Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage -GOV.UK \(www.gov.uk\)](#) School/College staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email

fm@fcdo.gov.uk.

Breast Flattening

Breast flattening, also known as breast ironing, is the pounding and massaging of a pubescent girl's breasts, using hard or heated objects, to try to make them stop developing or disappear. It is typically carried out by the girl's mother, who will say she is trying to protect the girl from sexual harassment and rape to prevent early pregnancy that would tarnish the family name, or to allow the girl to pursue education, rather than be forced into early marriage.

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.

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 and colleges 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.

Appendix 2

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 completed by the DSL or deputy
Do parents / Group Leader / Agent / Homestay / Other need to be informed?

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