

# Policy & Procedure

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Oxford Spires International is committed to providing a secure environment for both students and staff. Oxford Spires International will not tolerate extremist views of any kind in the school, whether it is from students, staff or external sources.

### **What is Radicalisation?**

Radicalisation is a process by which an individual or group comes to adopt increasingly extreme political, social or religious ideals and aspirations that (1) reject or undermine the status quo or (2) reject and/or undermine contemporary ideas and expressions of freedom of choice.

### **If you are found to be exchanging extremist ideas:**

- You may be excluded from activities or lessons or both
- You will have to write to your parents to explain to them why you have been excluded
- We will tell your Group Leader and the Centre Manager
- We will inform Head Office
- We may tell the police
- Your parents may have to pay for you to go home
- Are you being exposed to extremist views?
- If you are being exposed to extremist views, please tell an Oxford Spires International staff member or your Group Leader
- We will listen to you and take your complaint very seriously and offer you the support you need

IF YOU FEEL THAT YOU OR ANOTHER STUDENT IS AT RISK OF BEING EXPOSED TO EXTREMIST VIEWS PLEASE SPEAK WITH A MEMBER OF STAFF OR ASK TO SPEAK WITH THE CENTRE MANAGER.



Oxford Spires International believes that students thrive in an ordered environment in which everyone knows what is expected of them. At Oxford Spires, we aim to provide an environment in which students can develop self-discipline and self-esteem in an atmosphere of mutual respect, encouragement and safety.

**In order to achieve this, we adhere to the following guidelines:**

- All staff will provide a positive model for the students with regards to friendliness, care and courtesy, and will offer strategies for handling conflict if it arises
- Rules governing student conduct and disciplinary procedures are agreed and explained to all students, staff and group leaders upon arrival
- The school rules and disciplinary procedure are found in all student, group leader and staff handbooks for reference
- Staff ensure that these rules are applied in a consistent manner
- Good behaviour and participation in lessons and activities is praised
- Staff actively try to avoid attention-seeking through undesirable behaviour
- Bullying behaviour, in any form, which may be emotional, physical or verbal, is not tolerated. Students are encouraged to report any incidences of bullying to a member of staff. Staff should consult the Centre Manager if they receive a report of bullying
- Staff ensure they are aware of any issues arising from students' special needs

**When students behave in unacceptable ways:**

- They are spoken to clearly and calmly. It is always made clear to the student that it is the behaviour that is unwelcome, and not the individual
- In cases of serious misbehaviour, such as racial or other abuse, the unacceptable nature of the behaviour and attitudes is made clear immediately, but by means of explanation rather than personal blame. Staff should consult with the Senior Teacher or Centre Manager for support
- Staff are respectful and mindful of cultural expectations in all communication with students
- Unacceptable behaviour is dealt with promptly and as fairly as possible
- Efforts are made to understand the cause of the misbehaviour, explain to the student why it is not acceptable and find a solution



**The school does not:**

- Use or threaten physical punishment
- Single out or humiliate students
- Allow staff to shout or raise their voices in a threatening way
- Allow staff to speak to students in a rude or demeaning manner

## Disciplinary Procedure

Recurring or serious misbehaviour is dealt with by following the disciplinary procedure

**1. First Warning**

The student is given a verbal first warning by the Centre Manager

**2. Second Warning**

The student is given a written second warning by the Centre Manager. The Centre Manager completes an Incident Report form and sends this to Head Office, who will inform the students' parents and/or agent of the situation

**3. Final Warning**

The student is given a final written warning by the Centre Manager, with prior approval from the Academic Manager, which stipulates that they will be sent home immediately if they continue to behave in an unacceptable manner. The Centre Manager will complete an Incident Report form and send this to Head Office, who will communicate with parents/agents

**4. Expulsion**

A student may be asked to leave the course at their own expense. This may be recommended by the Centre Manager but must be approved by senior Head Office staff

Oxford Spires reserves the right, where appropriate, to exclude a student from a period of free time or excursion/activity alongside a warning. Students must never be left unattended

Oxford Spires reserves the right, at the discretion of senior Head Office staff, to administer an immediate final warning or exclusion for any serious breaches of discipline

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### **What is a bully?**

Somebody who uses repeated, hurtful behaviour towards another person who cannot defend him/herself.

### **Examples of bullying:**

- Hitting, kicking and taking personal possessions
- Calling people names, insulting people, making racist comments
- Telling nasty stories about people, excluding people from groups

### **If you are found to be bullying another student:**

- You will be excluded from activities, lessons or both
- You will have to write to your parents to explain to them why you are being excluded
- We will tell your Group Leader and the Centre Manager
- We will inform Oxford Spires International Head Office if you do not stop bullying
- We may tell the police
- Your parents may have to pay for you to go home.

### **Are you being bullied?**

If you are being bullied, please tell a staff member or your Group Leader.

We will listen to you and take your complaint very seriously and offer you the support you need.

**WE DO NOT TOLERATE BULLYING AND WE EXPECT ALL STUDENTS AND STAFF TO RESPECT THIS**



The Centre Manager must make all staff aware of this at the earliest possible convenience.

Each centre will have its own emergency evacuation procedure as set out by the school hosting the centre. However, these guidelines should be adhered to during the evacuation process.

- All staff should make themselves familiar with the fire exits and fire assembly points at the centre
- If you discover a fire, raise the alarm by activating the nearest alarm call point
- Trained persons only should tackle a fire, and only if they feel it is safe to do so
- On hearing the fire alarm, the Centre Manager and staff should lead the students out of the building by the nearest emergency exit and go to the assembly point. The Centre Manager should take the register with them
- One member of staff should lead the group and another member of staff should follow the group at the rear, ensuring all children are leaving in a quiet, orderly manner, walking as quickly as possible towards the assembly point
- The last member of staff to leave the room should close the door. Windows should be shut but only if this can be done quickly and without hazard
- Staff should check every room/small area/toilets as they pass so make sure no one is left behind
- A head count should immediately take place and the register taken. Staff and Group Leaders must also be accounted for

## **Residential**

- Each member or staff will be responsible for an allocated area in the residence
- Staff must open every bedroom door and make a head count after lights out
- All staff will take students to the designated meeting point
- A senior member of staff will take the register

Centre Manager will ensure the fire brigade are en route and that all staff, students and group leaders are accounted for.



Oxford Spires believes that children and parents are entitled to expect courtesy and prompt, careful attention to their needs and wishes.

We anticipate that most concerns will be resolved quickly by an informal approach to the appropriate member of staff. If this does not achieve the desired result, we have a set of procedures for dealing with concerns.

Under normal circumstances, the Centre Manager will be responsible for managing complaints. If a complaint is made against the Manager, the Operations Manager will conduct the investigation.

Our Complaints Procedure is as follows:

### **Making a complaint**

#### **Stage 1**

- Any student / group leader who has a concern about an aspect of the centre's provision should first talk about his/her concerns with the Centre Manager
- Most complaints should be resolved amicably and informally at this stage.

#### **Stage 2**

- If this does not have a satisfactory outcome, the student should put the concerns or complaint in writing to the Centre Manager
- The group leader is then sent a full response to the complaint within 24 hours or sooner if appropriate

#### **Stage 3**

- If the group leader is not satisfied with the outcome of the investigation, he or she should request a meeting with the Academic Manager. There should be witnesses present at the meeting
- Confidential records of meetings, discussions and decisions will be kept at all stages

### **Records**

A record of formal complaints against the centre, staff and students working in the centre is kept, detailing the date of the complaint, the circumstances and how it was managed





At Oxford Spires International, we understand the importance of ensuring that systems are in place for checking that our setting is a safe and secure place for children, staff and other visitors.

Our Health and Safety Policy aims to:

- To prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities
- To provide adequate training to ensure employees are competent to do their work
- To engage and consult with employees on day-to-day health and safety conditions and provide advice and supervision on occupational health
- To implement emergency procedures - evacuation in case of fire or other significant incident
- To maintain safe and healthy working conditions, provide and maintain, equipment and ensure safe storage / use of equipment

### **Procedures**

- Fire evacuation drills to be carried out at least once a week a year in conjunction with partner Colleges where necessary
- Log to be kept of drills. All staff members to be made aware of assembly points and procedures during their initial induction. All students to be made aware of procedures during first day orientation
- Fire risk assessments to take place as legally required.
- All fire exits and signage to comply with legal codes of practice.
- A risk assessment to be carried out annually in the winter of each year, action plan put forward as a result and remedial action taken in cases of hazard.
- All potential hazards or problems liable to affect the health and wellbeing of staff to be reported to the relevant member of staff and recorded in the log book.
- No member of staff should administer drugs of any description to students.
- Sanitary bins to be regularly emptied by approved contractors.
- All staff given Fire Safety and Health & Safety training upon arrival.



- Any emergency problems to be referred to one of the school's certified first aiders.
- Accident book to be kept at reception.
- First Aid kit to be kept appropriately stocked at all times and kept at reception.

In the event of students requesting medical attention, all requests should be passed to the course office and ideally one of the nominated people responsible for first aid.

Members of the centre team will assess the situation and present the following options, depending on the situation:

1. Book an appointment with a doctor
2. Call NHS Direct
3. Visit an emergency health centre
4. Visit the nearest local hospital A&E department
5. Contact the emergency services and call an ambulance

Depending on the circumstances, the office team may offer to pay for a taxi to the doctor's/hospital and will also offer to accompany the student there together with any visiting Group Leader.

Oxford Spires Language International is committed to the welfare of all children using its services. The following procedures are in place for the recruitment of Host families to ensure all Host families coming into contact with children are fully checked and are deemed suitable.

We use a variety of different homestay providers in Oxford & Cheltenham and therefore have an agreement in place for the following procedures to be adhered to:

**Host families are recruited using the following procedures:**

- Completion of an application form / enquiry form to be completed
- Candidates take part in a face to face interview / visit by Host family organiser at the homestay's accommodation
- Candidates will be required to have an enhanced DBS disclosure.
- Following British Council guidelines, these circumstances would be:
  1. The level of the existing DBS check is the same level needed by Oxford Spires
  2. The DBS check is less than 12 months' old
  3. The existing DBS check is for a similar post
  4. There are no unexplained gaps in a person's employment – a DBS check will not be used if there has been a break of more than three months in service
  5. The person's identity has been checked to ensure it matches the DBS check
  6. The existing check has been done with an organisation known to Oxford Spires which demonstrates safe recruitment procedures and who is able to confirm the status of the DBS is still correct to their knowledge
  7. Oxford Spires will ask to see the original DBS check
  8. Have a Gas Safety Certificate in place for their home
  9. Family and environment deemed suitable to host student's / group leaders
- In line with the DBS code of practice, we do not retain the DBS disclosure itself but will keep a record of its number and issue date. Only Host family's members themselves will keep a copy of their own DBS disclosure
- In line with Ofsted's guidelines, it is our policy not to routinely repeat DBS checks unless there is a break in employment or we are given information that suggests a person may no longer be suitable to look after children. However, we do currently aim to ensure each member of Host families has a DBS disclosure no more than three years old.
- Wherever possible, Oxford Spires will use the new DBS on-line updating service to check the status of Host families' DBS checks and we encourage all new Host families to subscribe to this
- All Host families are required to sign a Host Families Suitability declaration annually
- All appointments of Host families that maybe subject to the receipt of satisfactory references – we request these in writing from two referees
- Unless agreed prior to arrival between Oxford Spires and the Groups or parent, no adult to share the same house unless we have written permission from the parents or it is the child's parent
- No more than four students per host family unless it is agreed prior to arrival
- A minimum student age of 12 years old for students choosing host family accommodation



Oxford Spires Language School has the highest regard for students in our care. In the unlikely event that a student is missing, the following procedures will be followed:

### **Homestay Student missing at the start of the day**

**Allocated staff responsible for homestay students to alert Centre Manager once the student is 10 minutes late.**

Centre Manager will:

- Ask staff to check the premises (dining hall, break areas etc);
- Alert Group Leader where applicable and phone student/send them a message to find out where they are;
- If no answer after 5 minutes, contact Homestay Organiser to check a) the student is not still at home, or b) what time the student left for school

**If the student left for school on time, the host cannot explain their absence and the student is 30 minutes late with no contact, the Centre Manager will alert Head Office before contacting the police and following instructions.**

### **Homestay Student does not arrive home at agreed time**

**Host families to alert Homestay Organiser if their student does not arrive home within 10 minutes of their agreed curfew.**

Homestay Organiser will contact Centre Manager who will:

- Alert Group Leader where applicable and phone student/send them a message to find out where they are
- Check the Homestay Sign Out sheet to see what time the student left. If the student did not sign out, ask staff to check the premises (dining hall, break areas etc) and contact staff member responsible for homestay students signing out

**If the student left school on time and the student is 30 minutes late with no contact, Centre Manager will alert Senior Management before contacting the police and following instructions.**

### **Student missing from unsupervised free time on an off-site activity/excursion**

- Staff responsible for activity should phone the student to see where they are, or contact the Group Leader/Centre Manager if they do not have the students' contact details
- Staff responsible should allocate members of the team to search the area, if possible, to find the student



**If an individual cannot be found within 15 minutes and is not contactable, the Centre Manager must be informed.**

The Centre Manager will:

- Alert Group Leader where applicable
- Ask for details such as the exact location of the group, when and where the student was last seen, and accounts from their peers (students must always be in groups of 3 or more during unsupervised free time)

**If the student is 30 minutes late with no contact, Centre Manager will alert Senior Management before asking staff present to contact the police and follow instructions.**

If appropriate, and supervision ratios allow, one staff member can remain at the meeting point to wait for the missing student and the activity can be resumed with the rest of the group.

### **Contacting police**

Before making contact with the police, the Centre Manager should have as much information to hand as possible, such as:

- Students' age, description and any relevant medical information
- When the student was last seen
- The students' typical bus route or mode of transport to and from the school, where applicable

### **Contacting parents/guardians/agents**

At the time of alerting police, the students' agent and/or parents will be contacted to inform them of the situation and action being taken. Contact with parents and agents may only be made by Head Office in this situation.

### **Once A Student Has Been Found**

Head Office will inform parents, agents and any other parties immediately.

The Centre Manager will speak to the student as promptly as possible and determine why and how they went missing.

If the cause is found to be due to the will of the student (e.g. hiding from the group, intentionally staying out too long), then the Centre Manager will sanction the student using the Discipline Procedure.

An Incident Report form will be completed within 24 hours by the Centre Manager and sent to Head Office.

Relevant policies, procedures and risk assessments will be reviewed by the Centre Manager and Head Office, and any necessary changes brought into immediate effect.



Oxford Spires International is committed to ensuring the safety of children in our care. We recognise the importance of mobile phones for communication purposes, but are aware that casual or inappropriate use of mobile phones and technology in the childcare setting could pose a risk to children and staff.

## **Mobile Phones**

In order to remain contactable at all times during their shift, which is particularly important when offsite, all staff members must carry their mobile phone with them during working hours.

Staff must not have their phones on display or use their phones at any time for social purposes during lessons or whilst supervising students in any capacity.

## **Sharing Contact Details**

Staff must not share their personal contact details with any student before, during or after a programme.

Students will be asked for their contact number by the Centre Manager upon arrival and their numbers will be stored securely. Student contact numbers will be shared on a need-to-know basis with other staff members.

If it is necessary for staff to share contact details with a student (for example, for the student to have unsupervised free time), an offsite phone contact number is given and student details are recorded on the register.

## **At School and in The Classroom**

Staff may use their phone in order to avoid leaving their class during a lesson, if they need assistance from a senior staff member (for example, a student is missing).

Staff may use their phone if it is for the educational benefit of the class (for example, setting up a phone interaction quiz on the IWB).

## **Offsite**

Staff may use their personal phones, if they wish, to make contact with fellow staff members, as necessary for the organisation and safety of the trip (for example, coordinating with coach drivers).

Staff must take an offsite phone when they take students offsite, which is the only contact number they can share with students, and the only contact number they can use to communicate with group leaders during working hours.

## **At the Residence**

Staff must carry their phones at all times whilst on duty at the residence, but should avoid having them out and visible to students wherever possible.

## **Personal Use of Phones (staff)**

Staff needing to use their phone for emergency personal reasons during working hours are expected to find cover for their students before removing themselves to do so.

If you are likely to receive an emergency personal call please make your centre manager aware in advance.

## **Student Phones**

Students are permitted to have their phones with them in the classroom, but they must be on silent and in their bags unless the authorised by their teacher to use them for an activity.

Students must have their phones with them when travelling to and from school (homestay) and during any unsupervised free time on excursions.

During excursions, students may use their phones to take photographs, but must not use them to the detriment of their safety (for example, when crossing roads). Staff should monitor this.

Students may use their phones for personal calls during their breaks, lunch hour and chill out time.

## **Photography**

Staff must not take photographs of any students, for any reason, on their personal devices. Photography is permitted with the Centre Manager's work phone, or on the school cameras.

Photos should never be transferred from a company camera or phone onto a personal device without explicit permission from the Centre Manager.

## **Group Leaders**

Group Leaders are not permitted to take photographs of any children not in their group without consent from the Centre Manager.

With the Centre Manager's permission, they may be able to photograph other students, as part of a bigger group, but never individually.

## Social Media & Electronic Communication

Staff must not distribute (by any means) images or information about students of any age.

This includes:

- Use of student images
- Use of student details on blogs
- Any social networking sites or message systems

Remember that your personal profiles can be viewed by anyone, and people working with children should be especially careful about their personal web presence.

Staff must pay particular attention to use neutral, unemotive language that will not be misconstrued.

Staff must not exchange any information with a student that they would not be happy to share with the child's parent or carer.

Where necessary, any electronic contact will preferably be with the Group Leader.

Urgent contact with students must be through company provided centre mobiles.



Prevent is the first part in a larger government initiative to try to stop extremism and terrorism and tries to identify people who might be developing extremist values so they can be educated as to why this is not in keeping with British values.

Extremism is defined as: "Vocal or active opposition to fundamental British values ..... And calls for the death of members of our armed forces whether in this country or overseas."

**Prevent is not:**

- Spying on students and staff
- Trying to change someone's culture
- Stopping people from having opinions
- Stopping students from having discussions about criminalising people

To fulfil our legal requirements we have to make sure that our students, staff, host families, suppliers and group leaders exemplify British values.

These include:

**Democracy**

- Rule of law
- Individual liberty
- Mutual respect and tolerance for those with different faiths and beliefs

It is our duty to remind our students of British law. We will talk to the students about these in the first days of their course, especially to make sure that students realise that there can be no discrimination against anybody.

All staff have a responsibility to report any 'extreme' comments to senior school staff.

## General Details

**Oxford Spires International** is committed to recruiting staff with the fundamental skills and attributes to fulfil its corporate aims and objectives. The Recruitment Policy aims to provide clear guidance to managers in relation to both the selection and appointment of staff. This policy promotes and supports good practice for those with responsibility for recruitment.

This policy aims to achieve the following objectives:

- To recruit staff with the appropriate skills, both technical and personal, in order to meet the company's current and future needs.
- To recruit staff that have an affinity with working with young learners, and are suitable to fulfil pastoral needs – to include an appropriate DBS check.
- To ensure that staff appointed to posts involving teaching responsibilities are qualified to carry out such duties.
- To ensure a fair and effective recruitment procedure, that is consistent with employment legislation.
- To develop and enhance the public image of Oxford Spires International, both as an employer and as a quality provider of education.

All staff employed by Oxford Spires International will be responsible for working with young people under the age of 18 years old in some capacity; as a responsible employer, we will insist on conducting thorough reference and vetting checks on each successful candidate.

## Staff Recruitment Procedure

### Staff are recruited using the following procedures:

- All staff taking part in the recruitment process will be trained in Safe Recruitment
- Safeguarding requirements for staff are made clear in all job adverts
- All candidates must complete a Job Application form
- Candidates are interviewed by two members of staff
- Two satisfactory references are required for each member of staff, ideally from their most recent employer and/or someone who can best judge their suitability to work with children (eg college tutor, scout leader)
- Staff may be allowed to start work pending the receipt of the second reference if the first reference has been verified by a telephone call
- Where possible, candidates will be required to complete a trial session at the setting before the post is formally offered
- All job offers are made subject to satisfactory completion of a probation period

## DBS Disclosures

- Staff should have an enhanced DBS disclosure before starting work. In certain circumstances, it may be possible for staff to start work whilst waiting for a DBS check to come through – if this is the case, a risk assessment will be completed and if judged safe, the member of staff will be allowed to work under supervision and not be left alone with children at any time. (For Language School Teachers, part of this risk assessment will include a Barred List check.)
- All staff working with a member of staff without a completed DBS disclosure will be made aware of their status so that they are never given unsupervised access to children.
- In certain circumstances, it may be possible to accept an existing DBS disclosure. Following Ofsted guidelines, these circumstances would be:
  1. The level of the existing DBS check is the same level needed by Oxford Spires International
  2. The DBS check is less than 12 months old (3 months for language school teachers, who will also need to be checked on the barred list)
  3. The existing DBS check is for a similar post in the children’s workforce
  4. There are no unexplained gaps in a person’s employment – a DBS check will not be used if there has been a break of more than three months in service
  5. The person’s identity has been checked to ensure it matches the DBS check
  6. The existing check has been done with an organisation which demonstrates safe recruitment procedures and who is able to confirm the status of the DBS is still correct to their knowledge
  7. The DBS certificate will be seen and checked by an Oxford Spires International Manager
- In line with Ofsted guidelines, it is our policy not to routinely repeat DBS checks unless there is a break in employment, or we are given information that suggests a person may no longer be suitable to look after children. However, we do currently aim to ensure each member of staff has a DBS disclosure no more than three years old.
- Wherever possible, Oxford Spires International will use the new DBS on-line update service to check the status of staff’s DBS checks and we encourage all new staff to subscribe to this.

## Overseas Criminal Record Checks

- If a candidate has lived overseas in the 5 years preceding a job offer, a criminal record check from each country they have spent a continuous period of 3 months or more will be required.
- If it is found that it is not possible to obtain a criminal record check from a particular country, a reference will be obtained from an appropriate referee in that country covering the time they spent there.
- If an overseas criminal record is not complete before the starting dates of the candidate, a risk assessment will be completed.
- If judged safe, the member of staff may be allowed to work under supervision and not be left alone with children at any time.
- All staff working with a member of staff with incomplete checks will be made aware of their status so that they are never given unsupervised access to children.



## Qualifications

- Where posts require a particular qualification, evidence of the qualification will be checked, and a copy of the certificate will be kept on file
- For Language School teachers, non-standard TEFL qualifications will be investigated to ensure they meet the required standard

## Other Safeguards

- All staff are required to sign a Staff Suitability Declaration annually
- If any member of staff has incomplete checks before their start date, a risk assessment will be completed and, if judged safe, they will be allowed to work under supervision and not be left alone with children at any time, until full checks are completed.
- All staff working with a member of staff without completed checks will be made aware of their status so that they are never given unsupervised access to children.
- All staff are given training in safeguarding when they start work and this is reviewed on a regular basis.

At Oxford Spires International, we understand the importance of ensuring that systems are in place for checking that our setting is a safe and secure place for children, staff and other visitors.

Our risk assessment procedures are part of a continuous process to prevent any dangerous incident taking place.

They are the responsibility of all staff as part of their daily duties.

- The Centre Manager will ensure that risk assessments are completed, and if judged necessary, logged and effectively monitored
- All staff are required to read, understand and contribute to risk assessments and be aware of the process of putting risk assessments in place
- Written risk assessments will be carried out for the environment of the setting, any activities that are deemed to have a medium to high risk and for off-site excursions
- Each written risk assessment is dated and states when it needs to be reviewed - this will be at least annually or when there is any change to circumstances, equipment or resources, any change to the premises, or when particular needs of a child or other visitor necessitates this
- The Centre Manager is responsible for conducting any necessary reviews or making changes to existing risk assessments in the light of any potential risks that they or other members of staff discover
- Staff will be encouraged to risk assess all activities, and equipment at all times, though not all of these will necessarily be put in writing. They will be asked to consider:
  - What is the hazard?
  - Who is at risk?
  - What could happen?
  - How can the risk be minimised?
  - What needs to be done?
  - Once action has been taken to reduce the risks, do the benefits of doing the activity outweigh the risks involved?
- A visual inspection of both the equipment and the entire premises – both indoor and outdoor – will be carried out on daily basis using a checklist
- Staff will be vigilant and continuously aware of any potential risks to health and safety



# Safeguarding

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## Introduction & Safeguarding Definitions

**The Oxford Spires International Safeguarding policy is a group wide policy for Oxford Active including the following Ofsted and British Council accredited programmes.**

- Oxford Spires International (Multi-centre accredited language school provider for young learners)
- Active Camps (A UK day camp provider, Including 'Adventure' & 'Plus' Courses)
- Active Clubs (A UK before and after school club provider)

The term **"Safeguarding"** is defined as:

1. Protecting children from maltreatment
2. Preventing impairment of children's health or development
3. Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
4. Taking action to enable all children to have the best outcomes

For the purposes of this policy, "a child" is anyone under the age of 18.

Oxford Active acknowledges its duty of care to safeguard and promote the welfare of children using its services. This policy outlines the measures taken to ensure that our safeguarding practices always reflect statutory responsibilities and put the welfare and interests of children first. Our policy is written in accordance with "Working Together to Safeguard Children 2018" and "Prevent Duty Guidance for England and Wales 2015".

A child-centred approach is fundamental to safeguarding and promoting the welfare of every child. A child-centred approach means keeping the welfare of the child as the primary focus in all decision making, working in partnership with them, their families and local authorities.

Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

## Statement of Intent

Oxford Active fulfils this duty through employing the following:

- All members of staff working with children are required to undertake appropriate safeguarding training relevant to their role, including the Prevent Duty, to ensure that they have up-to-date knowledge of safeguarding issues, are able to identify signs of possible abuse and neglect at the earliest opportunity, and know how to respond in a timely and appropriate way.
- Each setting has a named Designated Safeguarding Lead (DSL), who has undertaken safeguarding lead training in line with the Oxfordshire Safeguarding Children Board.
- To prevent the employment of unsuitable individuals, all staff at Oxford Active are employed in line with the Safer Recruitment procedures as outlined in the Safer Recruitment policy found in appendix 4.



- The use of mobile phones and cameras by all adults at settings is strictly controlled - this is covered in the Mobile Phone and Cameras policies found in appendix 6
- Staff will seek to build children's resilience to radicalisation by promoting fundamental British Values, in order to provide a safe environment which allows children to discuss sensitive or controversial issues openly.

### Concerns, Suspicions & Investigating

In all cases where abuse (see APPENDIX 1) is suspected or being investigated

All concerns, suspicions and investigations must be thoroughly, factually documented. This document should include the child's name, address and date of birth, timed and dated observations which objectively describe the child's behaviour and appearance and, where possible, the exact words spoken by the child. These records should be kept separately from the main records of the child. All recorded concerns should be signed and dated.

All concerns, investigations and subsequent documentation are to be kept confidential. These records should only be shared with those who need to know - the setting DSL and at least one member of The Oxford Active Safeguarding Team (TOAST) – unless otherwise advised by the Multi-Agency Safeguarding Hub (MASH), or the Local Authority Designated Officer (LADO).

### Safeguarding Concerns & Disclosures

- Whilst it is not staff's responsibility to diagnose abuse, it is however, their duty to alert the appropriate authorities if they have knowledge of the abuse or neglect of a child, or concerns about the welfare and safety of a child.
- Concerns over changes in a child's behaviour or appearance, unexplained bruising or marks, any comments made by a child or any deterioration in a child's general well-being should be reported promptly to the setting's DSL. A summary of the different categories of abuse is contained in Appendix 1.
- Whenever concerns are raised due to possible signs of abuse, the child and/or the child's parent or carer will initially be consulted for an explanation, and this will be recorded.
- If any explanations fail to allay fears for the child's safety, then the setting's DSL will contact the local **MASH**, and will also report the concern to **TOAST**.
- If there is any doubt or uncertainty about whether the concerns require escalation, a no-names consultation will be sought with the local MASH by the concerned adult or DSL.
- Staff will keep parents/carers fully informed of any actions they undertake unless advised otherwise by the investigating authority.
- When a setting is based in the school the child attends, it may also be appropriate to consult the school's DSL so that relevant information can be shared.
- If children are suspected to be at risk of radicalisation, a referral should be made to Channel via MASH.
- When **definite** concerns about abuse arise (for example, if a child confides in an adult about abuse taking place) then the appropriate MASH should be contacted **without delay** by the DSL.
- Once MASH has been informed of the allegation, TOAST carry forward the responsibility of liaising with the relevant agencies and authorities.

## Whistle Blowing (Allegations Against Staff Members)

- Staff should take proactive measures to protect themselves against misunderstandings and false allegations. This includes avoiding being alone with any child at any time. Additionally, being mindful of any physical contact or inappropriate language/ conversation topics.
- Any concerns or allegations against members must be reported to the DSL, who must record the details of the incident and report this to the LADO **immediately**. In this circumstance, delays of even an hour could severely harm the subsequent investigation.
- If the allegations are against the DSL, they must be reported directly and immediately to TOAST.
- The DSL for the setting must also report this, simultaneously, to a member of TOAST, unless otherwise advised by the LADO.
- In Ofsted registered settings, any allegations against staff will be reported to Ofsted as soon as possible by TOAST.
- Once the LADO has been informed of the allegation, TOAST carry forward the responsibility of liaising with the relevant agencies and authorities.
- Staff will co-operate entirely with any investigation carried out by the LADO.
- Any staff suspected of abuse will be suspended from duty immediately on full pay whilst the allegation is investigated. This is not an indication that the alleged incident has taken place, but is to protect the staff member, as well as children and families, throughout the process. If the allegation is unsubstantiated, the member of staff may return to work.

## How to Handle a Disclosure

Know	Record	Report
<ul style="list-style-type: none"> <li>• Stop &amp; Listen</li> <li>• Never make a promise</li> <li>• Keep calm, don't panic and don't appear shocked or angry</li> <li>• Keep responses short, simple, slow and gentle</li> <li>• Avoid making judgements</li> <li>• Avoid criticising the alleged perpetrator</li> <li>• "What you are saying is important"</li> <li>• "I'm glad you were able to tell me"</li> <li>• "I will do my best to help you"</li> <li>• This is so important; I need to talk to someone about it"</li> </ul>	<ul style="list-style-type: none"> <li>• Do not ask leading questions</li> <li>• Make brief notes</li> <li>• Tell the child they are not to blame and have done the right thing by telling you</li> <li>• <b>Be factual</b></li> <li>• Use an incident form</li> <li>• Remember to write any questions you may ask the child as well as their responses</li> <li>• Keep any notes in the child's own words</li> <li>• Date and time</li> <li>• Print and sign your name</li> <li>• Record as much detail as possible</li> <li>• Uphold confidentiality</li> <li>• Never think a concern is too small - it could form part of the bigger picture around the child</li> </ul>	<ul style="list-style-type: none"> <li>• Never attempt to carry out an investigation</li> <li>• Do not delay in passing on concerns</li> <li>• Report the incident to your DSL</li> <li>• Follow the Escalation Process</li> <li>• Protect and support the child</li> <li>• Keep the child informed</li> </ul>

## LSCB, MASH & LADO County Contacts for all Oxford Active Settings

Local Safeguarding Children's Board (LSCB)	Multi Agency Safeguarding Hub (MASH)	MASH (Out of hours)	Local Authority Designated Officer (LADO)	LSCB Web address
Oxfordshire	0845 050 7666 <a href="mailto:mash-childrens@oxfordshire.gcsx.gov.uk">mash-childrens@oxfordshire.gcsx.gov.uk</a>	0800 833408	01865 810603 <a href="mailto:LADO.safeguardingchildren@oxfordshire.gov.uk">LADO.safeguardingchildren@oxfordshire.gov.uk</a>	<a href="http://www.oscb.org.uk">www.oscb.org.uk</a>
Wokingham	0118 908 8802	01344 786543	0118 9746141 <a href="mailto:LADO@wokingham.gcsx.gov.uk">LADO@wokingham.gcsx.gov.uk</a>	<a href="http://www.wokingham.lscb.org.uk">www.wokingham.lscb.org.uk</a>
Warwickshire	01926 414144 <a href="mailto:johncoleman@warwickshire.gov.uk">johncoleman@warwickshire.gov.uk</a>	01926 886922	01926 743433 <a href="mailto:LADO@warwickshire.gov.uk">LADO@warwickshire.gov.uk</a>	<a href="http://www.warwickshire.gov.uk/mash">www.warwickshire.gov.uk/mash</a>
Bromley	0208 4617373 0208 4617309 <a href="mailto:mash@bromely.gov.uk">mash@bromely.gov.uk</a>	0300 3038671	020 846 17669 <a href="mailto:rita.dada@bromely.gov.uk">rita.dada@bromely.gov.uk</a>	<a href="http://www.bromley.gov.uk/info/200127/">www.bromley.gov.uk/info/200127/</a>
Cambridgeshire	03450451362 <a href="mailto:Referralcentre.children@cambridgeshire.gov.uk">Referralcentre.children@cambridgeshire.gov.uk</a>	0173323472 4	01223727967 <a href="mailto:lado@cambridgeshire.gov.uk">lado@cambridgeshire.gov.uk</a>	<a href="http://www.safeguardingcambspeterborough.org.uk">www.safeguardingcambspeterborough.org.uk</a>
Southampton	02380833336 <a href="mailto:mash@southampton.gov.uk">mash@southampton.gov.uk</a>	0238023334 4	01962 876364	<a href="http://www.hampshiresafeguardingchildrenboard.org.uk">www.hampshiresafeguardingchildrenboard.org.uk</a>
Gloucestershire	01452 426565 <a href="mailto:childrenshelpdesk@gloucestershire.gov.uk">childrenshelpdesk@gloucestershire.gov.uk</a>	0800 5420202	01452 426320 <a href="https://ques-online.com/Gloucestershire/eLADO/Live#!/Public">https://ques-online.com/Gloucestershire/eLADO/Live#!/Public</a>	<a href="http://www.gscb.org.uk">www.gscb.org.uk</a>

The above grid is a list of relevant, current contacts, relating to the following agencies:

1. Local Safeguarding Children's Board (LSCB)
2. Multi Agency Safeguarding Hub (MASH)
3. Local Authority Designated Officer (LADO)
4. Local Safeguarding Children's Board (LSCB) Website

## APPENDIX 1 - Categories of Abuse

The table below outlines the four main categories of abuse as defined by the Department of Health 'Working Together to Safeguard Children' document 2010. Staff should be aware that the possible indicators are not definitive and that some children may present these behaviours for reasons other than abuse.

Type of Abuse: Neglect	Possible Indicators
<ul style="list-style-type: none"> <li>• The persistent failure to meet a child's basic physical and psychological needs, likely to result in the serious impairments of the child's health or development</li> <li>• Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:               <ul style="list-style-type: none"> <li>○ Provide food, clothing and shelter</li> <li>○ Protect a child from physical and emotional harm or danger</li> <li>○ Ensure adequate supervision</li> <li>○ Ensure access to appropriate medical care or treatment</li> </ul> </li> </ul>	<p>Obvious signs of lack of care, including:</p> <ul style="list-style-type: none"> <li>• Problems with personal hygiene</li> <li>• Constant hunger</li> <li>• Inadequate clothing</li> <li>• Emaciation</li> <li>• Lateness or non-attendance</li> <li>• Poor relationship with peers</li> <li>• Untreated medical problems</li> <li>• Compulsive stealing and scavenging</li> <li>• Rocking, hair twisting, thumb sucking</li> <li>• Running away</li> <li>• Low self-esteem</li> </ul>
Type of Abuse: Physical Abuse	Possible Indicators
<ul style="list-style-type: none"> <li>• May involve; hitting, shaking, throwing, poisoning, burning or scalding. Drowning, suffocating, or otherwise causing physical harm to a child</li> <li>• Physical harm may also be caused when a parent or carer fabricates the symptoms or, or deliberately induces illness in a child</li> </ul>	<ul style="list-style-type: none"> <li>• Physical signs that do not tally with the given account of occurrence</li> <li>• Conflicting or unrealistic explanations of cause repeated injuries</li> <li>• Delay in reporting or seeking medical advice</li> </ul>
Type of Abuse: Sexual Abuse	Possible Indicators
<ul style="list-style-type: none"> <li>• Forcing or enticing to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening</li> <li>• The activities may involve physical contact, penetrative or non-penetrative acts and includes children in watching pornographic material or watching sexual acts</li> </ul>	<ul style="list-style-type: none"> <li>• Displays of affection which are sexual and age inappropriate</li> <li>• Sudden change in behaviour</li> <li>• Tendency to cling or need constant reassurance</li> <li>• Tendency to cry easily</li> <li>• Regression to younger behaviour</li> <li>• Unexplained gifts or money</li> <li>• Depression and withdrawal</li> <li>• Wetting/soiling day or night</li> <li>• Fear of undressing</li> </ul>
Type of Abuse: Emotional Abuse	Possible Indicators
<ul style="list-style-type: none"> <li>• The persistent emotional maltreatment of a child as to cause severe and persistent adverse effects on the child's emotional development</li> <li>• It may involve conveying to children that they are worthless or unloved. Inadequate, or valued only insofar as they meet the needs of another person</li> </ul>	<ul style="list-style-type: none"> <li>• Isolation</li> <li>• Rejection</li> <li>• Child being blamed for actions of an adult</li> <li>• Child being used as a carer for young siblings</li> <li>• Affection and basic emotional care giving/warmth, persistently absent or withheld</li> </ul>

This is by no means an exhaustive list. There are several other safeguarding issues that staff should be aware of such as:

- Child sexual exploitation (CSE)
- Forced marriages (FM)
- Female Genital Mutilation (FGM)
- Prevent
- Homelessness
- Children in the court system
- Children missing from education
- Children with family members in prison
- Child criminal exploitation
- Domestic Abuse
- So-called “Honour based violence”
- Sexting in schools

Further training in each of these categories is available through Oxfordshire Safeguarding Children Board (OSCB). This can be arranged on request.

Oxford Active acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring practice reflects statutory responsibilities, government guidance and complies with best practice and British Council requirements.

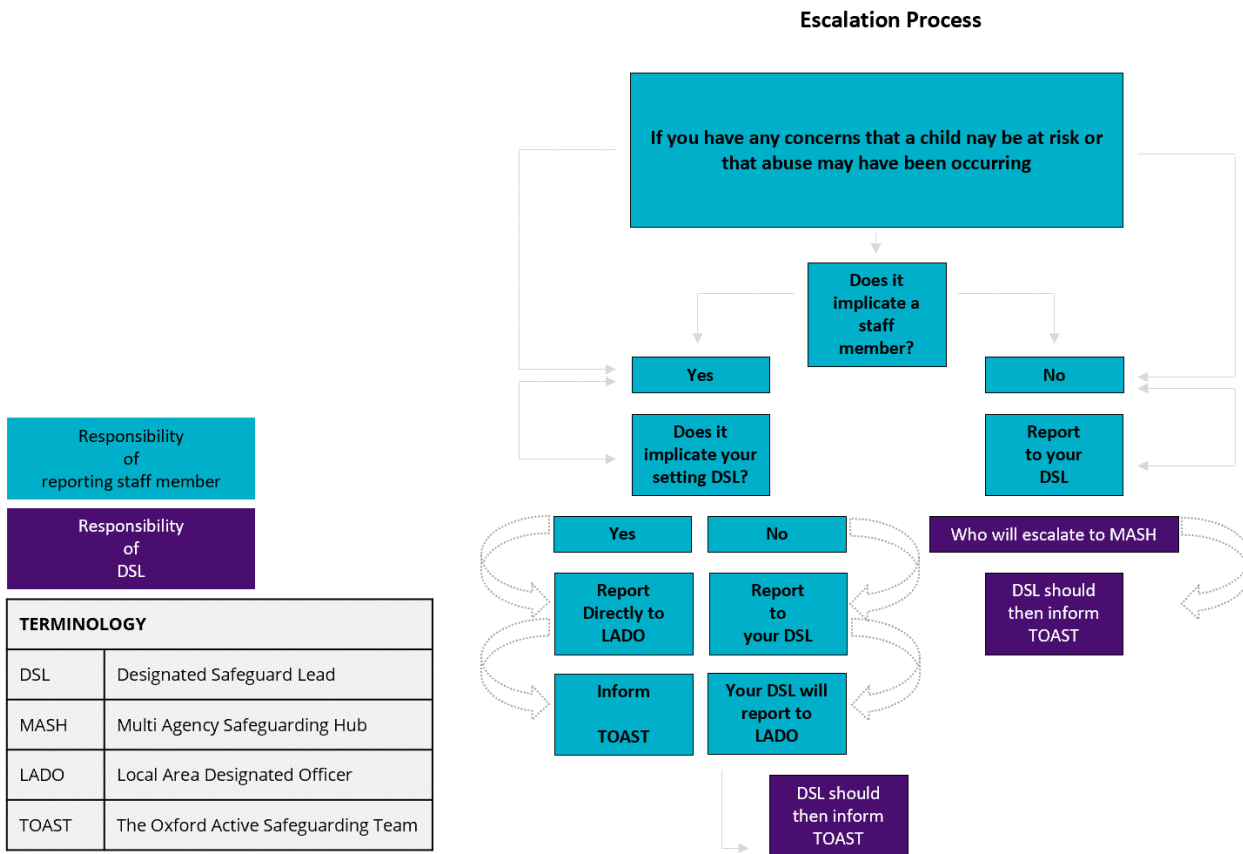
## Statutory Guidance & Compliance

The policy gives due regard to statutory guidance and complies with the following legislation as follows:

Organisation	Website/Resource
Section 11 Children Act 2004	<a href="#">Current Legislation</a>
Section 17 & 47 Children Act 1989	<a href="#">Current Legislation</a>
Working together to safeguard children	<a href="#">A guide to inter-agency working to safeguard and promote the welfare of children</a>
The Prevent Duty	<a href="#">Departmental advice for schools and childcare providers</a>
Information Sharing	<a href="#">Advice for practitioners providing safeguarding services to children, young people, parents and carers</a>
Counter Terrorism Act	<a href="#">Explanatory notes relate to the Counterterrorism and Security Act 2015</a>
Keeping Children Safe in Education	<a href="#">Statutory guidance for schools and colleges</a>
UN Convention on the Rights of the Child 1989	<a href="#">How we Protect Children’s Rights with the UN Convention on the Rights of the Child</a>
What to do if you’re worried a Child is being Abused?	<a href="#">Advice for practitioners</a>
NSPCC	<a href="http://www.nspcc.org.uk">www.nspcc.org.uk</a>
Barnardos	<a href="http://www.barnardos.org.uk">www.barnardos.org.uk</a>

## APPENDIX 2 – Safeguarding Escalation Process and Contact Details

The following is guide for staff on the Escalation Process if there are any concerns that a child or student could be at risk or that abuse may have been occurring.



## APPENDIX 3 – Safeguarding Contact Information – Oxford Spires International

Designated Senior Person: Matt Simmonite

### The Oxford Active's Safeguarding Team (TOAST):

Oxford Active Designated Safeguarding Lead Peter Parry on 01865 594324 or 07984 011987

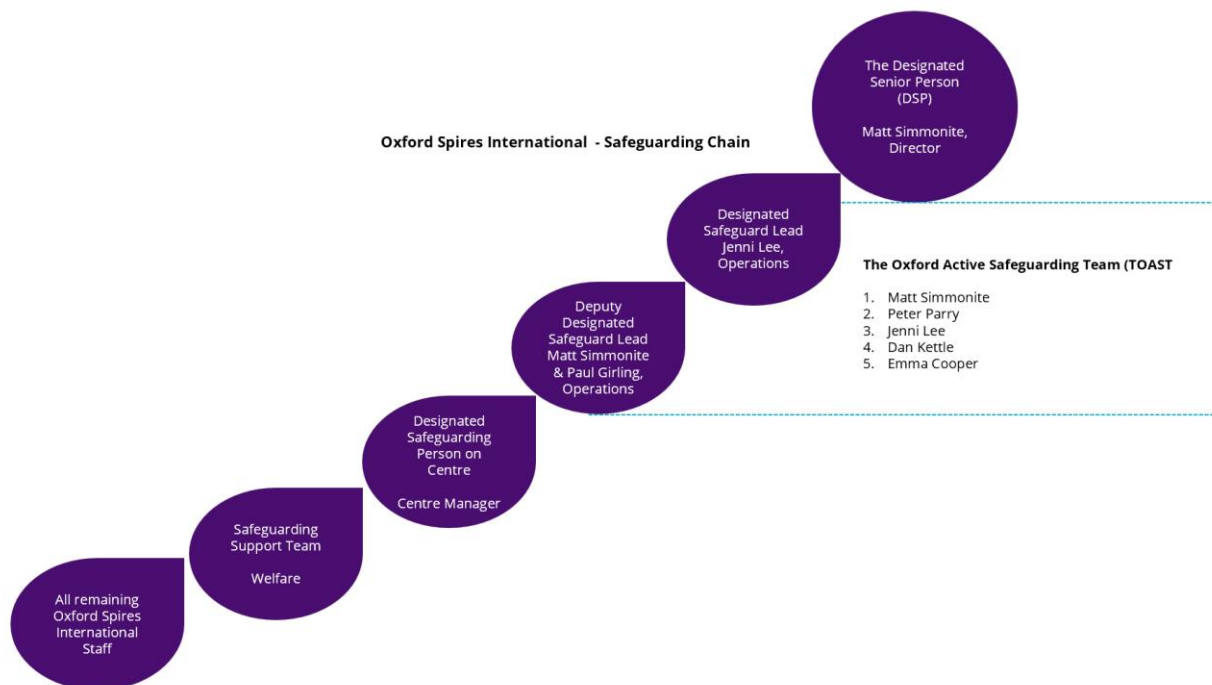
Oxford Spires International Designated Safeguarding Lead Matt Simmonite: 07966 153955

Active Camps Designated Safeguarding Lead Dan Kettle on 07900 956103

Active Clubs Designated Safeguarding Lead Emma Cooper on 07733 446124

Please note if you are unable to contact your company's Safeguarding Lead you can contact any other member of TOAST.

## Oxford Spires International Individual Responsibilities



## The Oxford Active Safeguarding Team (TOAST) Responsibilities

### **The Designated Senior Person (DSP) (Matt Simmonite, Director)**

- The DSP is supported by Peter Parry (Head of Safeguarding, Oxford Active). The DSP has the overall view of the Oxford Spires International procedures and deputies the daily safeguarding responsibilities to the Designated Safeguarding Lead who is supported by a team of Deputy Safeguarding Designated Persons.
- Trained to Safeguarding Level 3

### **DSL Designated Safeguarding Lead (Jenni Lee)**

- Trained to Safeguarding Level 3 – DSL
- The Designated Safeguarding Lead has responsibility for the safeguarding and welfare of students, supported by all members of summer school staff
- Providing advice and support to all staff on issues relating to child protection
- Reporting any concerns about Adults that pose a risk to children to the Local Authority Designated Officer (LADO)
- Concerns raised by children or staff on behalf of children to the Local Safeguarding Partners (LSP) and the police
- Maintaining a complete and up-to-date record of all child protection-related concerns, issues, incidents, reports, referrals and complaints
- Ensure safeguarding standards are communicated to all staff and training is enough and appropriate

### **Deputy Designated Safeguarding Leads (Matt Simmonite, Paul Girling)**

- Trained to Safeguarding Level 3 – DSL
- Responsible for supporting the Designated Safeguarding Lead in their daily duties and overall responsibilities
- Ensuring that all staff training required and completed in relation to child protection is recorded and audited regularly to identify training needs and any recording gaps
- Ensuring that all students have enough and appropriate means to report concerns, issues and incidents. Assume DSL duties and responsibilities in their absence or handle any complaints or allegations against the nominated lead if appropriate

### **Designated Safeguarding Person on Centre (Centre Manager)**

- Trained to Safeguarding Level 2
- Overall accountability for the safeguarding and welfare of students lies with the Centre Manager for each centre
- Point of contact for all centre staff for welfare or safeguarding concern
- Ensuring that all students receive a full induction and timely updates on matters relating to safeguarding and welfare
- As line managers to individual centres, the DSP on Centre is accountable for ensuring Centre Management Teams, Welfare Officers and all members of staff implement the Safeguarding Policy
- Responsible for the day to day functioning of the team

### **Safeguarding Support Team (Welfare Team)**

- Basic Safeguarding training
- Our Welfare members of staff are the point of contact for students with everyday queries, needs or



concerns relating to their welfare

- Welfare members of staff closely monitor and document student welfare and maintain accurate records of the issues of day to day issues and outcomes, reporting any issues to management that they feel are more serious

### **All Staff Members**

- Basic Safeguarding training
- All staff share a responsibility to protect students from harm, which includes being vigilant in identifying signs and symptoms of physical and psychological abuse and neglect and reporting any concerns in accordance with our policy

### **Staff Training & Induction Process**

#### **Staff Training**

All new and returning staff undergo training to ensure they are sufficiently prepared for their role and responsibilities. Safeguarding plays a key element.

#### **Handbooks**

All employees will be required to read our Safeguarding Policy as part of their induction process. The importance of safeguarding children is also included in each role specific handbook.

#### **Online Training**

All employees will follow , the following Safeguarding training prior to their arrival:

#### **1. Safeguarding – Oxfordshire Safeguarding Children Board**

An Introduction to Safeguarding' (level 1 – Introductory)

#### **2. Prevent – HM Government E-Learning Training on Prevent**

This is introductory training. It will provide an important foundation on which to develop further knowledge around the risks of radicalisation and the role that you can play in supporting those at risk

The online training is supported by a full description of our policies, procedures, practices and provisions in relation to the safeguarding of our students.

Staff must bring their 'Certificate of Successful Completion' with them on their arrival at the centre, prior to commencing their duties.

#### **Centre Arrival**

The centre arrival induction is designed to reinforce the points above (and other training elements explicit in the online training, policies and handbooks) and provide centre specific information. All staff are required to sign their induction form to record that they have received and understood the training and documentation, which includes Safeguarding.

#### **Continuing Professional Development (CPD)**

If any areas are identified as lacking, staff will receive the necessary training. Head Office will also conduct centre visits whereby staff will be randomly selected and tested on their safeguarding knowledge.

## **Safer Recruitment and Recruitment Policy**

Oxford Active place the safeguarding and safety of all children and young people as their number one priority, and therefore follow a strict safer recruitment policy, to protect both the children and young people and the staff working within the individual centre settings, and wider offices.

### **APPENDIX 4 – Safer Recruitment Policy**

**Oxford Active** is committed to the welfare of all children and young people using its services. The following procedures are in place for the recruitment of staff to ensure all staff coming into contact with children are fully checked and are deemed suitable.

#### **Staff are recruited using the following procedures:**

- All staff taking part in the recruitment process will be trained in Safe Recruitment
- Safeguarding requirements for staff are made clear in all job adverts
- All candidates must complete a Job Application form
- Candidates are interviewed by two members of staff
- Two satisfactory references are required for each member of staff, ideally from their most recent employer and/or someone who can best judge their suitability to work with children (e.g. college tutor, scout leader)
- Staff may be allowed to start work pending the receipt of the second reference if the first reference has been verified by a telephone call
- Where possible, candidates will be required to complete a trial session at the setting before the post is formally offered
- All job offers are made subject to satisfactory completion of a probation period

#### **DBS Disclosures**

- Staff should have an enhanced DBS disclosure before starting work. In certain circumstances, it may be possible for staff to start work whilst waiting for a DBS check to come through – if this is the case, a risk assessment will be completed and if judged safe, the member of staff will be allowed to work under supervision and not be left alone with children at any time. (For Language School Teachers, part of this risk assessment will include a Barred List check.)
- All staff working with a member of staff without a completed DBS disclosure will be made aware of their status so that they are never given unsupervised access to children.
- In certain circumstances, it may be possible to accept an existing DBS disclosure. Following Ofsted guidelines, these circumstances would be:
  1. The level of the existing DBS check is the same level needed by Oxford Active
  2. The DBS check is less than 12 months old (3 months for Oxford Spires International Language teachers, who will also need to be checked on the barred list)
  3. The existing DBS check is for a similar post in the children’s workforce

4. There are no unexplained gaps in a person's employment – a DBS check will not be used if there has been a break of more than three months in service
  5. The person's identity has been checked to ensure it matches the DBS check. The existing check has been done with an organisation which demonstrates safe recruitment procedures and who is able to confirm the status of the DBS is still correct to their knowledge.
  6. The DBS certificate will be seen and checked by an Oxford Active Manager
- In line with Ofsted guidelines, it is our policy not to routinely repeat DBS checks unless there is a break in employment, or we are given information that suggests a person may no longer be suitable to look after children. However, we do currently aim to ensure each member of staff has a DBS disclosure no more than three years old.
  - Wherever possible, Oxford Active will use the new DBS on-line update service to check the status of staff's DBS checks and we encourage all new staff to subscribe to this.

### Overseas Criminal Record Checks

- If a candidate has lived overseas in the 5 years preceding a job offer, a criminal record check from each country they have spent a continuous period of 3 months or more will be required.
- If it is found that it is not possible to obtain a criminal record check from a particular country, a reference will be obtained from an appropriate referee in that country covering the time they spent there.
- If an overseas criminal record is not complete before the starting dates of the candidate, a risk assessment will be completed. If judged safe, the member of staff may be allowed to work under supervision and not be left alone with children at any time.
- All staff working with a member of staff with incomplete checks will be made aware of their status so that they are never given unsupervised access to children.

### Qualifications

- Where posts require a particular qualification, evidence of the qualification will be checked, and a copy of the certificate will be kept on file
- For Language School teachers, non-standard TEFL qualifications will be investigated to ensure they meet the required standard

### Other Safeguards

- All staff are required to sign a Staff Suitability Declaration annually
- If any member of staff has incomplete checks before their start date, a risk assessment will be completed and, if judged safe, they will be allowed to work under supervision and not be left alone with children at any time, until full checks are completed.
- All staff working with a member of staff without completed checks will be made aware of their status so that they are never given unsupervised access to children.
- All staff are given training in safeguarding when they start work and this is reviewed on a regular basis.

### APPENDIX 5 - Information Sharing Myths

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.

Myth-busting guide to information sharing information enables practitioners and agencies to identify and provide appropriate services that safeguard and promote the welfare of children.

Below are common myths that may hinder effective information sharing.

**Data protection legislation is a barrier to sharing information** No – the Data Protection Act 2018 and GDPR do not prohibit the collection and sharing of personal information, but rather provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them.

**Consent is always needed to share personal information** No – you do not necessarily need consent to share personal information. Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. You should seek consent where an individual may not expect their information to be passed on. When you gain consent to share information, it must be explicit, and freely given. There may be some circumstances where it is not appropriate to seek consent, because the individual cannot give consent, or it is not reasonable to obtain consent, or because to gain consent would put a child's or young person's safety at risk.

### **Personal information collected by one organisation/agency cannot be disclosed to another**

No – this is not the case, unless the information is to be used for a purpose incompatible with the purpose for which it was originally collected. In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners<sup>14</sup>.

### **The common law duty of confidence and the Human Rights Act 1998 prevent the sharing of personal information**

No – this is not the case. In addition to the Data Protection Act 2018 and GDPR, practitioners need to balance the common law duty of confidence and the Human Rights Act 1998 against the effect on individuals or others of not sharing the information.

### **IT Systems are often a barrier to effective information sharing**

No – IT systems, such as the Child Protection Information Sharing project (CP-IS), can be useful for information sharing. IT systems are most valuable when practitioners use the shared data to make more informed decisions about how to support and safeguard a child.

### **APPENDIX 6A: Policy for Use of Mobile Phones, Cameras, Social Media and Electronic Communication (Oxford Spires International)**

Oxford Spires International is committed to ensuring the safety of children in our care. We recognise the importance of mobile phones for communication purposes but are aware that casual or inappropriate use of mobile phones and technology in the childcare setting could pose a risk to children and staff.

#### **Mobile Phones**

In order to remain contactable always during their shift, which is particularly important when offsite, all staff members must carry their mobile phone with them during working hours.

Staff must not have their phones on display or use their phones at any time for social purposes during lessons or whilst supervising students in any capacity.

#### **Sharing Contact Details**

Staff must not share their personal contact details with any student before, during or after a programme.

Students will be asked for their contact number by the Centre Manager upon arrival and their numbers will be stored securely. Student contact numbers will be shared on a need-to-know basis with other staff members.

If it is necessary for staff to share contact details with a student (for example, for the student to have unsupervised free time), an offsite phone contact number is given, and student details are recorded on the register.

#### **At School and In the Classroom**

Staff may use their phone in order to avoid leaving their class during a lesson, if they need assistance from a senior staff member (for example, a student is missing).

Staff may use their phone if it is for the educational benefit of the class (for example, setting up a phone interaction quiz on the IWB).

### **Offsite**

Staff may use their personal phones, if they wish, to contact fellow staff members, as necessary for the organisation and safety of the trip (for example, coordinating with coach drivers).

Staff must take an offsite phone when they take students offsite, which is the only contact number they can share with students, and the only contact number they can use to communicate with group leaders during working hours.

### **At the Residence**

Staff must always carry their phones whilst on duty at the residence but should avoid having them out and visible to students wherever possible.

### **Personal Use of Phones (staff)**

Staff needing to use their phone for emergency personal reasons during working hours are expected to find cover for their students before removing themselves to do so.

If staff are likely to receive an emergency personal call, they should make sure the centre manager is aware in advance.

### **Student Phones**

Students are permitted to have their phones with them in the classroom, but they must be on silent and in their bags unless the authorised by their teacher to use them for an activity.

Students must have their phones with them when travelling to and from school (homestay) and during any unsupervised free time on excursions.

During excursions, students may use their phones to take photographs, but must not use them to the detriment of their safety (for example, when crossing roads). Staff should monitor this.

Students may use their phones for personal calls during their breaks, lunch hour and chill out time.

### **Photography**

Staff must not take photographs of any students, for any reason, on their personal devices. Photography is permitted with the Centre Manager's work phone, or on the school cameras.

Photos should never be transferred from a company camera or phone onto a personal device without explicit permission from the Centre Manager.

### **Group Leaders**

Group Leaders are not permitted to take photographs of any children not in their group without consent from the Centre Manager.

With the Centre Manager's permission, they may be able to photograph other students, as part of a bigger group, but never individually

### APPENDIX 6B: Policy for Use of Mobile phones and Cameras (AC,ASC,AA,A+) (Oxford Active)

Oxford Active is committed to ensuring the safety of children in its care. We recognise the importance of mobile phones for communication purposes but are aware that casual or inappropriate use of mobile phones in the setting could pose a risk to children.

#### **Setting phone**

Each setting will have its own mobile phone, and this number will be given to parents/carers and others who may need to contact the setting. There may also be occasions when the Manager's personal phone is used as their work phone.

#### **Staff personal mobile phones**

Staff will not be permitted to use their personal mobile phones whilst working. They will be required to switch their personal mobile phones off or leave them in a safe place. Managers may carry their personal phones when they are working but will only use them for essential work-related communication.

Where it is essential for staff to make or receive a personal call during a session, staff should seek permission from the Manager and do this in a separate area not used by children. Staff will not be permitted to take photographs using their phone at the setting. Any staff caught breaking these rules may be subject to disciplinary action.

#### **Children**

Children are asked not to bring mobile phones into the setting. If they do bring them, it will be at their own risk and they will not be permitted to use them during camp or club hours unless given permission and supervised by a member of staff.

#### **Photographs**

It is recognised that one of the key ways to support children's development, and engage parents in children's learning, is through photographs that record their children's activities and achievements. We will seek permission from parents/carers to take photographs of their children for this purpose, using the setting's own camera.

Staff's personal camera or video functions on mobile phones will not be used in the setting.

### APPENDIX 7: Managing Risk Onsite

Oxford Active rents a variety of premises in the course of everyday business, this includes both open and closed access sites. This appendix stipulates the processes that should be followed to assess and mitigate the safeguarding implications of the way access is controlled and supervised at each of these locations.

There will be differences to how safeguarding is delivered at each centre due to location, physical layout of campus/building, type of program and age range of children/young people. For this reason, a comprehensive risk assessment is carried out at each site, before the start of any program. This is done to identify vulnerabilities and to define strategies to mitigate these and reduce the overall risk to the students and young people or to improve the accountability or ability to investigate a safeguarding concern or allocation.

Each risk assessment will pay particular attention to accessibility by the general public, visitors, shared site access, recruitment standards, unsupervised students and young people and the implications of the age range included on the programme (in particular when 18 year old students come as part of a group).

Each risk assessment must be reviewed by senior management before the start of any delivery, to ensure the level of remaining risk is within reasonable limits. This assessment is then shared with all staff working onsite and is to remain under constant review. It is the responsibility of the DSL for that site to review and update this document as and when new risks or strategies are identified.

If Oxford Active is not the exclusive organisation on any particular site, due diligence is required on all other operating organisations to ensure their compliance with our standards. This should be detailed in the site risk assessment. In particular, the following need to be obtained from each separate organisation onsite:

- A declaration outlining each organisation's safer recruitment policies and evidence that this has been followed.
- Clear premise boundaries agreed between Oxford Active and any other organisations on site, including any areas of shared use identified.
- An outline of each organisation's visitor policy including their level of supervision whilst on site and responsibility of recording attendance.
- Each organisation's public/employers' liability certificate



Prevent is the first part in a larger government initiative to try to stop extremism and terrorism and tries to identify people who might be developing extremist values so they can be educated as to why this is not in keeping with British values.

Extremism is defined as: "Vocal or active opposition to fundamental British values ..... And calls for the death of members of our armed forces whether in this country or overseas."

**Prevent is not:**

- Spying on students and staff
- Trying to change someone's culture
- Stopping people from having opinions
- Stopping students from having discussions about criminalising people

To fulfil our legal requirements we have to make sure that our students, staff, host families, suppliers and group leaders exemplify British values.

These include:

**Democracy**

- Rule of law
- Individual liberty
- Mutual respect and tolerance for those with different faiths and beliefs

It is our duty to remind our students of British law. We will talk to the students about these in the first days of their course, especially to make sure that students realise that there can be no discrimination against anybody.

All staff have a responsibility to report any 'extreme' comments to senior school staff.

If a student wishes to make a complaint during the course, they should follow the complaints procedure outlined below:

1. **Speak to any member of staff at the centre**, who will direct the student to the most appropriate person to speak to about the problem. All efforts will be made to resolve the complaint quickly and effectively
2. If the problem has not been resolved, the student should **speak to the Centre Manager**, who will try to resolve the complaint immediately. The Centre Manager may contact Head Office for assistance if appropriate. All complaints made at this stage must be logged using the Complaint Form
3. If the problem has still not been resolved, **Head Office** should be contacted in writing and the complaint will be referred to the Director. All complaints will be recorded, investigated and logged. The outcome will be communicated to all relevant parties
4. If the outcome is still not satisfactory, the student or their representative should write to the Chief Executive of our members' association, **English UK** at:

*47 Brunswick Court, Tanner Street, London, SE1 3LH.*

***Complaints regarding the Course will not be considered after the Student has finished their Course.***



All new and returning Oxford Spires Staff undergo training to ensure they are sufficiently prepared for their role and responsibilities. Safeguarding plays a key element.

All Oxford Spires International staff receive a full induction prior to students' arrival. The centre induction is designed to provide centre specific information. All staff are required to sign an induction form to record that they have received and understood the training and documentation, which includes Safeguarding.

The induction typically covers the following areas:

### **Welcome & Introductions**

- About Oxford Spires
- Meet the Management Team
- Roles Responsibilities & Communication Channels
- Oxford Spires Mission, Vision and Values
- Staff Portal & Handbooks
- Staff Expectations

### **Overview & Logistics**

- Locations
- Student Numbers
- Group Details
- Staff Overview
- Rotas & Timetables

### **Safety, Welfare & Supervision**

- Incident & Accident Forms
- Missing Student Procedures
- Emergency Planning
- Safeguarding Training
- Policy Training

### **Using the Database (Elsieapp)**

- Registers
- Allergies, Special Educational Needs (SEN), Additional Information
- Homestay Students
- Room Lists

### **Student Management**

- Behaviour Management
- Student Complaints



In addition to the induction of all staff a range of written, online and other face to face training is given:

### **Written Induction Materials**

- All staff are sent the Staff Handbook and company Safeguarding Policy along with their work contracts
- All staff are sent the Staff Information Pack at least a week before their contract starts
- All teaching staff are sent the Teacher Handbook at least a week before their contract starts

### **Online Training**

- All staff complete an Introduction to Safeguarding and Prevent course before arrival

### **Face to Face Training**

- The Centre Managers arrive at least a day before their staff to receive a face-to-face induction in Head Office (see checklist)
- The Senior Teachers receive a face-to-face induction (one day) with the Operations /Academic Manager before the teaching staff arrive
- All other staff attend a compulsory, paid induction before the students arrive, which goes over the content of the handbooks in more detail (see checklist). Staff are then divided into activity and teaching staff for role-specific training
- Any staff arriving once the programme has started will receive a shorter induction with the Centre Manager and Senior Teacher/Senior Activity Leader before starting work

### **Continuous Development**

If any areas are identified as lacking, staff will receive the necessary training.

Oxford Spires Head Office will also conduct Centre Checks whereby staff will be randomly selected and tested on their knowledge, in particular Safeguarding.

### **Follow these rules and have a happy, safe and enjoyable stay in the U.K.**

#### **YOUR ENGLISH CLASSES**

- You must come to your English classes every day
- If you are ill, or have a problem, tell your Group Leader or Homestay Host
- You must come to your classes at the correct time – do not be late!
- Always listen to your teacher
- Respect your teacher and the other students in your class
- Always speak English in class
- Do not be disruptive in class

#### **THE ACTIVITY PROGRAMME**

- You must come to all the activities and excursions on your programme
- If you are ill, or have a problem, tell your Group Leader or Homestay Host
- You must come to activities and excursions on time – do not be late!
- Respect Spires staff, Group Leaders and other students
- Always listen carefully to instructions given to you by Spires staff

#### **RESIDENTIAL RULES**

- You must never leave the college campus alone or with friends
- You can only leave the college campus with Spires staff or with your Group Leader if they have permission from the Centre Manager to take you out
- You must be quiet in your residence bedrooms in the evenings
- The lights in your bedroom should be switched off by 11pm

#### **HOMESTAY RULES**

- You must go home directly after activities have finished in the afternoon or when directed
- Your Host is responsible for your welfare and must know where you are, what you are doing and at what time you are returning home
- You must not go out in the evenings alone or with friends unless you have a Spires organised activity or if your Group Leader has permission to take you out from the Centre Manager
- You must always travel home from activities with another student, your Group Leader or by taxi
- Never walk home alone after evening activities

#### **IF YOU BREAK THESE RULES**

- You will be excluded from the activity programme and/or your English classes
- You will have to explain to the Spires Centre Manager
- Spires will telephone your parents or your agent
- You will have to explain to your parents or agent
- You may have to return home early and your parents will have to pay



## At the Airport

### Arrivals

- A designated representative will meet groups and individuals at a ratio of 1:20 including group leaders
- Any group of less than 3 students arriving outside of standard hours or airports will not be supervised by a member of staff during their arrival, but instead by a designated driver/chauffeur or equivalent (who will meet safer recruitment legislation) This will be communicated to parents/agents in advance

### Departures

- Groups will be seen onto their coach by Oxford Spires staff (except where not possible or in unsocial hours) and then supervised during departure by their group leaders
- Individuals travelling as unaccompanied minors will be supervised by staff
- Individuals not travelling as unaccompanied minors will be supervised by staff or the driver/chauffeur until they reach airport security

## Offsite Activities/Excursions

- Group Leaders cannot supervise students outside of their own group at any time.
- Students aged 13+
  - A minimum staff/student ratio of 1:20 will be upheld at all times. Group leaders are additional and not considered in this ratio
- Students aged 12 and under
  - A minimum adult/ratio of 1:10 at all times, of which at least one adult for every 20 students is staff

## Free Time on Excursions

- Supervised Free Time:
  - Students aged 13 years and under, and students without written parental consent, do not have permission to have unsupervised free time. During any periods of free time, they must be accompanied by a staff member or their group leader at a ratio of 1:10
- Unsupervised Free Time:
  - Students aged 14 years and over, with written parental consent, are permitted to have unsupervised free time during excursions. Consent must be confirmed by senior staff
- The following rules must be observed:
  - Students must be in groups of 3 or more
- Students must “check in” with staff at a designated meeting point every hour
- Students must be wearing the emergency number wristband and have their phones
- Unsupervised free time must only take place in predetermined areas of a city, such as pedestrian-only zones and shopping centres
- A member of staff must wait at the designated meeting point for the duration of the unsupervised free time, in case any students need to return early



### Onsite Activities/Lessons

- Students will be supervised at a ratio of 1:20, which includes group leaders. Students must never be left unsupervised during an onsite activity or in a classroom
- Mealtimes and breaks will be supervised by staff and group leaders on a rota basis
- Group Leaders cannot supervise students outside of their own group at any time

### Student Sickness

#### Homestay Students

- Homestay students who are unwell will stay at home with an adult member of their host family, or with their group leader, if possible. If neither option is possible, the school will arrange for the student to get to school in private transport or a taxi, where they will be cared for and supervised onsite

#### Residential Students

- Residential students who are unwell will stay at the residence with a staff member or with their group leader, if possible. If neither option is possible or practical, the student will be cared for and supervised onsite at the school

Any student taken to hospital or medical centres will be accompanied by a member of staff and/or their group leader as appropriate.

### Residential Supervision

#### Free Time in the Residence

- Students will be supervised at a ratio of adult/student 1:20, including group leaders

### Overnight Supervision

- At least one member of staff per block will be “on call” overnight every night, overseeing a maximum of 60 students (but no more than 20 *individual* [non-group] students aged 12-17 or 15 students aged under 12) plus one group leader per group of 20 students aged 12-17 or 15 students aged under 12
- Group leaders cannot be counted in ratios to students outside of their own group
- A senior member of staff will also be allocated each night, to be referred to in emergencies and lead any evacuation
- On call staff duties are outlined separately

Oxford Spires International welcome visits and visitors at all venues, schools and centres. We adhere to the following guidelines with regard to visits of all kinds including:

- Family & friends visits
  - Agent visits
  - Supplier visits
  - Head office visits
- 
1. All visitors, except those employed by the Oxford Active Partnership, should give at least 12 hours' notice to the Centre Manager before their visit
  2. All visitors must sign in and out the building. The Centre Manager should ensure that all visitors have signed in
  3. All visitors must wear a lanyard with an ID card
  4. The visitor must provide a form of photo identification when they arrive
  5. The Centre Manager should be informed by the visitor of any dietary or mobility requirements at least 48 hours in advance to ensure compliance at the site
  6. No visitor should be left unattended at the centre. They must always stay with an Oxford Spires International member of staff
  7. If staff see any unknown adults or children on site, they should challenge them and report them to the Centre Manager who will check their ID and reason for visiting
  8. Visitors outside of the Oxford Active Partnership are not allowed to take photographs at any time without the express permission of the Centre Manager

