



**OXFORD SPIRES**  
INTERNATIONAL

# **Safeguarding & Child Protection Policy**

2024

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All Oxford Spires' policies will be ratified by the Board of Directors and signed by the Chairperson. Each policy will be co-signed by the centre manager of each centre. Review dates will be regularly set in line with policy updates.

<b>Coordinator</b>	<b>Nominated Director</b>	<b>Chair of Board of Directors</b>
Rob McWilliams	Matt Simmonite	Matt Simmonite
<b>DSL</b>	<b>Deputy DSL</b>	
Rob McWilliams	Matt Simmonite	

# Introduction

We have a statutory duty to safeguard and promote the welfare of children as described in section 7 of the Education (Independent Centre Standards) (England) Regulations 2014 and that we have due regard to the guidance 'Keeping Children Safe in Education: Statutory Guidance for Centres and Centres (DfE) and 'Working Together to Safeguard Children' (DfE) as the safety and protection of children is of paramount importance to everyone in this centre. At all times we will ensure what is best in the interests of all children.

Safeguarding and promoting the welfare of children is best defined as:

**'Protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best out-comes'. Keeping Children Safe in Education: Statutory Guidance for Centres and Centres (DfE)**

We understand that 'safeguarding is what we do for all children, whilst child protection refers to the procedures we use for children at risk of significant harm or who have been harmed.

Oxford Spires believes that all students deserve the opportunity to achieve their full potential and the purpose of all intervention is to safeguard and promote the welfare of the student. Although the policy refers to 'children', we believe that protection of all young people is paramount. This is particularly true as all Oxford Spires students are away from their home environments and may be emotionally vulnerable. For those staff who engage with students who are from cultures different to those of the professionals, assumption and stereotyping must not be part of our practice and every effort must be made to ensure that cultural issues are understood and that each individual case is dealt with on its own merits.

- We are particularly alert to the potential need for **\*early help** for a young person who:
- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is misusing drugs or alcohol;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has been in care either in the UK or another country;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;

*\*Keeping Children Safe in Education: Statutory Guidance for Centres and Centres (DfE)*

We want all of our students to achieve their full potential by:

- being as physically and mentally healthy as possible;
- experiencing good quality education opportunities;
- living in a safe environment;
- learning and working in a safe environment;
- experiencing emotional wellbeing;
- feeling loved and valued;
- receiving support from a network of reliable and affectionate relationships;
- learning to look after themselves;
- coping with everyday living;
- having a sense of identity and a positive image of themselves;
- developing their confidence and their interpersonal skills

We recognise that the safety and protection of students is the responsibility of all centre personnel and volunteers as they are in a unique position to notice injuries, marks or bruises when children are undertaking certain activities which might indicate a child has been abused. We believe that we must report and investigate all injuries for the safety and protection of the children in our care.

We acknowledge that children can be harmed physically, emotionally, sexually or by neglect. It is our duty to report any concerns that we have of child abuse as the health, safety and protection of all children and young people is paramount. We are aware that if abuse is suspected by another child then child protection procedures will be applied to both children.

We understand abuse to be the maltreatment of a child. While:

- **physical abuse** is a 'form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child';
- **emotional abuse** is the 'persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.';
- **sexual abuse** 'involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening';
- **neglect** is the 'persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.'.

We are aware that safeguarding issues can manifest themselves via **peer-on-peer abuse** in the form of bullying (including cyberbullying); physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals.

We have a duty to ensure centre personnel have the skills, knowledge and understanding to keep looked after children safe and to be alert to the additional safeguarding challenges to children with special educational needs and disabilities.

We are aware that safeguarding incidents and/or behaviours can be associated with factors outside the centre and/or can occur between young people outside the centre. We must consider, at all times, the context within which such incidents and/or behaviours occur. This is known as '**contextual safeguarding**', which simply means assessments of young people should consider whether wider environmental factors are present in a young person's life that are a threat to their safety and/or welfare.

We are aware that child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.' We will report any concerns we may have regarding a student being possibly sexually exploited.

We are aware that **female genital mutilation (FGM)** is a form of child abuse and violence against women and affects girls particularly from north African countries. It is illegal in England and Wales to allow girls to undergo this practice, which involves the 'partial or total removal of the external female genitalia for non-medical reasons'.

We are aware that section 5b of the FGM Act 2003 has introduced a mandatory reporting duty which requires health and social care professionals and teachers in England and Wales to report to the police when a girl under the age of 18 informs them that FGM has been carried out on them or if they observe physical signs that FGM has been carried out.

Mandatory reporting duty does not apply if a person suspects that FGM has been carried out or whether they consider a girl may be at risk of FGM. In this instance we are expected to follow local safeguarding procedures. Centre personnel who fail to comply with the mandatory duty face disciplinary procedures.

We are aware that so-called '**honour-based' violence (HBV)** encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing'.

Centre personnel who have a concern regarding a child that might be at risk of HBV or who has suffered from HBV will report their concern to the DSL or deputy DSL.

We have a duty to safeguard children, young people and families from **violent extremism**. We are aware that there are extremist groups within our country who wish to radicalise vulnerable children and to involve them in terrorism or in activity in support of terrorism. Periodic risk assessments are undertaken to assess the risk of students being drawn into terrorism. Centre personnel must be aware of the increased risk of online radicalisation, and alert to changes in student's behaviour. Any concerns will be reported to the Designated Safeguarding Lead.

We are aware that under the 'Counter-Terrorism and Security Act 2015' we have the duty to have 'due regard to the need to prevent people from being drawn into terrorism'. This duty is known as the **prevent duty** and we believe it is essential that centre personnel are able to identify those who may be vulnerable to radicalisation or being influenced by extremist views, and then to know what to do when they are identified.

We provide a safe environment where we promote students' welfare. Within this environment we work hard to build students' resilience to radicalisation and extremism by promoting **fundamental British values** and for everyone to understand the risks associated with terrorism. We want students to develop their knowledge and skills in order to challenge extremist views.

Advice and support to protecting children from the risk of radicalisation is provided for all centre personnel by the Designated Safeguarding Lead who has undertaken Prevent awareness training (Workshop to Raise Awareness of Prevent).

We are aware that **privately fostered children** fall into the category of a potentially vulnerable group and must be monitored by the local authority. Therefore, it is our duty to report to the local authority any child who is being privately fostered. On admission to the centre, we will ensure that the parental responsibility of a child is established.

We have a duty to ensure the **online safety** of all students and centre personnel. We also have a duty to provide students with quality Internet access as part of their learning experience across all curricular areas. The use of the Internet is an invaluable tool in the development of lifelong learning skills.

We believe that used correctly, Internet access will not only raise standards, but it will support teacher's professional work and it will enhance the centre's management information and business administration systems.

We acknowledge that the increased provision of the Internet in and out of centre brings with it the need to ensure that learners are safe. We need to teach students how to evaluate Internet information and to take care of their own safety and security.

**E-Safety**, which encompasses Internet technologies and electronic communications, will educate students about the benefits and risks of using technology and provides safeguards and awareness to enable them to control their online experience.

Every Oxford Spires centre has appointed the Welfare Officer as a **Designated Safeguarding Lead**.

All centre personnel should be aware of who this person is and what their role is. The Designated Safeguarding Lead should act as a source of advice and co-ordinate action within the centre over cases of abuse.

The Designated Safeguarding Lead will work closely with the Deputy Designated Lead(s) and Centre Manager within the centre. The names of those appointed as Designated Safeguarding Lead and Deputy Designated Safeguarding Lead(s) are listed in this policy. They will need to liaise with all agencies and build a good working relationship with colleagues from these agencies.

The Designated Safeguarding Lead should possess skills in recognising and dealing with child welfare concerns, and Child Protection Training (advanced) and support should be given. The Designated Safeguarding Lead should be the first person to whom education staff report cases. It is then the responsibility of the Designated Safeguarding Lead to discuss the situation with the relevant members of staff and the relevant agencies. The Designated Safeguarding Lead will appoint a Deputy Designated Safeguarding Lead and should have arrangements in place for when the Designated Safeguarding Lead is absent.

The DfE has clear guidelines on what centres, Governing Bodies and Local Education Authorities (LEAs) should do if they suspect that a child has been abused or assaulted. It is not, however, the responsibility of teachers and other staff in centres to investigate suspected abuse. They should not take action beyond that agreed in the procedures established by their **Local Safeguarding Children Board (LSCB)**.



The Designated Safeguarding Lead is responsible for referring cases of suspected abuse or allegations to the relevant investigating agencies according to the procedures established by their local LSCB and LA. They must also be able to deal with allegations made against members of staff.

We will inform the Local Authority Designated Officer/ Local MASH (Multi-Agency Safeguarding Hub) of any allegations of abuse by any member of the centre personnel whether they took place on the centre premises or elsewhere and of the action taken in respect of these allegations.

We will also inform the Local Authority Designated Officer / Local **MASH (Multi-Agency Safeguarding Hub)** of any person connected to the centre who is considered to be unsuitable to work with children.

We are committed in establishing and maintaining an ethos where young people and parents feel secure in being able to talk confidently to centre personnel about any concerns or fears they may have knowing that they will be taken seriously.

We will ensure that the curriculum deals with safeguarding through activities and opportunities in PSHE/ Citizenship that will equip students with the necessary skills and awareness to stay safe from abuse. We want young people to understand risk, to become more resilient and know where to go for help and support not only in centre but also in the local community.

We have a duty to create and maintain a culture of safe recruitment and to establish and maintain correct procedures that will 'help deter, reject or identify people who might abuse children.' Procedures, such as 'criminal record checks (DBS checks), barred list checks and prohibition checks together with references and interview information' will be used in order to determine the suitability of a prospective employee.

We are committed in establishing and maintaining procedures for safer recruitment and sound working relationships with parents, agents, homestay providers, guardians and support agencies.

We believe that 'everyone who comes into contact with young people and their families has a role to play in safeguarding. Therefore, we believe it is essential that this policy clearly identifies and outlines the roles and responsibilities of all those involved in the procedures and arrangements that are connected with this policy.

We are aware that the General Data Protection Regulations (GDPR) has entirely replaced the previous **Data Protection Act (DPA)** making changes to many previous data protection rules and regulations that centres, academies and other educational establishments adhered to under the DPA. The is to strengthen and unify the safety and security of all data held within an organisation.

We have a duty not to 'prevent, or limit, the sharing of information for the purposes of keeping children safe'. We are aware that legal and secure information sharing between centres, Children's Social Care and other local agencies, is essential for keeping children safe and ensuring they get the support they need. Information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children.'

# Related Legislation & Guidance

We believe this policy relates to the following legislation (click on the links below to access information):

- [Children Act 1989](#)
- [Police Act 1997](#)
- [Police Act 1997 \(Criminal Records\) Regulations 2002](#)
- [The Education \(Independent Centre Standards\) \(England\) Regulations 2014](#)
- [Children Act 2004](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Children and Young Persons Act 2008](#)
- [Police Act 1997 \(Criminal Records\) \(No. 2\) Regulations 2009](#)
- [Equality Act 2010](#)
- [Protection of Freedoms Act 2012](#)
- [Childcare \(Disqualification\) Regulations 2009](#)
- [Sexual Offences Act 2003](#)
- [Counter Terrorism and Security Act 2015](#)
- [FGM Act 2003](#)
- [Serious Crime Act 2015](#)

The following documentation and online guidance is also related to this policy (click on the link below to access information):

- [Keeping Children Safe in Education: Statutory Guidance for Centres and Centres \(DfE\)](#)
- [Working together to safeguard children \(DfE\)](#)
- [Mental Health and Behaviour in Centres: Departmental Advice \(DfE\)](#)
- [What to do if you're worried a child is being abused \(HM Government\)](#)
- [Information Sharing 2015: advice for practitioners providing safeguarding services \(HM Government\)](#)
- [Prevent Duty Guidance \(HM Gov\)](#)
- [Protecting children from radicalisation: the prevent duty \(DfE\)](#)
- [Preventing extremism in centres and children's services \(DfE\)](#)
- [SMSC requirements for independent centres \(DfE\)](#)
- [What to do if you suspect a child is being sexually exploited \(DfE\)](#)
- [Mandatory Reporting of Female Genital Mutilation - procedural information \(HM Government\)](#)
- [Child Sexual Exploitation – definition and guide for practitioners \(DfE\)](#)
- [Sexual violence and sexual harassment between children in centres and centres \(DfE\)](#)
- [Modern Slavery Training: resources \(HM Gov\)](#)
- [NSPCC: Child Trafficking](#)
- [Sexting in Centres and Centres \(UKCCIS\)](#)

# Oxford Spires' Aims:

- To have in place procedures to ensure that we meet our responsibilities for safeguarding and promoting the welfare of children from abuse;
- To ensure that all centre personnel are aware of what action to take when dealing with a child protection issue;
- To have in place the appropriate personnel to ensure that we meet our responsibilities for safeguarding and promoting the welfare of children from abuse;
- To ensure all centre personnel know the names of the Designated Safeguarding Lead and associated staff such as the Deputy Designated Safeguarding Lead(s)
- To organise and update training regularly to maintain the level and practice of Safeguarding in our centres;
- To be aware of the Local Children's Safeguarding Board and MASH Team (Multi-Agency Safeguarding Hub) and refer to them if required for training and advice as and when necessary;
- To create and provide a learning environment that is safe, secure, warm and welcoming for students combined with sound security systems and procedures;
- To be alert to the additional safeguarding challenges to children with special educational needs and disabilities;
- To establish and maintain an ethos where students, parents, agents, guardians and host carers feel secure in being able to talk confidently to centre personnel about any concerns or fears they may have knowing that they will be taken seriously;
- To establish and maintain procedures for safer recruitment and to establish and maintain sound working relationships with parents, agents, guardians and support agencies;
- To work with other centres to share good practice in order to improve this policy;

# Policy Procedure

## Role of the Directors

### The Board:

- has appointed a Designated Safeguarding Lead for child protection;
- has nominated the Centre Manager to liaise with the Designated Safeguarding Lead and appoint Deputy Designated Safeguarding Leads from the senior leadership team;
- has in place job descriptions for both the Designated Safeguarding Lead and the Deputy Designated Safeguarding Lead;
- nominated the Managing Director to visit the centre regularly, to liaise with the Centre Manager and Designated Safeguarding Lead and to report back to the Board of Directors;
- has delegated powers and responsibilities to the Centre Manager and Designated Safeguarding Lead to ensure everyone connected with the centre is aware of and complies with this policy, including being aware of the names of the Designated Safeguarding Lead and the Deputy Designated Safeguarding Leads;
- has in place safer recruitment procedures;
- has responsibility to ensure Disclosure and Barring Service checks are undertaken for everyone working with children in the centre;
- has responsibility to ensure the board of directors and those working within the company who have unsupervised contact with students have Enhanced DBS checks;
- has in place procedures to deal with allegations of abuse against members of staff and volunteers;
- has nominated the Centre Manager and Designated Safeguarding Lead to undertake appropriate training about the ways of safeguarding students;
- will annually review all child protection and safeguarding policies and procedures;
- has responsibility to ensure that there are excellent lines of communication and the sharing of information with local agencies such as social services, the police and health care services;
- has responsibility for the effective implementation, monitoring and evaluation of this policy

## Role of the Academic Operations Manager

### The Operations Managers will:

- ensure the implementation of this policy;
- be nominated as a Designated Safeguarding Lead and ensure that he/she is aware of his/her responsibilities;
- nominate Deputy Designated Safeguarding Leads from the senior leadership team and ensure that they are aware of their responsibilities;
- work closely with the Designated Safeguarding Lead and Safeguarding Committee on child protection;
- ensure everyone connected with the centre is fully aware of this policy, including host carers;

- ensure all staff are aware of and comply with the Staff Code of Conduct (appendix E)
- ensure students and staff are aware of the rules and arrangements for under 18s (appendix F)
- ensure all centre personnel read Part One of 'Keeping Children Safe in Education';
- ensure a Welfare Risk Assessment is conducted by the Welfare Officer, which outlines procedures in place to minimise risk to under 18s in a mixed age environment and additional welfare provision in place for all students – this should be conducted for both the centre and any residential accommodation;
- ensure adequate resources exist for the Designated Safeguarding Lead to undertake his/her role;
- undertake training in safeguarding and child protection, including how to identify abuse and when/how to report a concern;
- ensure all safeguarding policies and procedures are fully implemented;
- ensure safer recruitment procedures are followed including enhanced DBS checks (including Barred List checks) are undertaken for everyone working with children in the centre;
- ensure that prohibition checks are carried out for everyone in teaching work and to check that no one is restricted from working as a teacher in another EEA country;
- provide counselling to centre personnel, should they be affected by an incident,
- establish links with appropriate external agencies such as Social Care, Local Authority, Local Safeguarding Children Board (LSCB);
- keep up-to-date with all new guidance on safeguarding children;
- ensure all cases of suspected or actual problems associated with child protection are investigated and dealt with effectively;
- support and counselling to centre personnel if they feel distressed from being involved with a traumatic child protection case or incident;
- ensure appropriate training is provided for all centre personnel, host carers and Directors and include training as part of staff and host carer induction;
- ensure that all centre personnel and volunteers are able to highlight improvements to the safeguarding policies and procedures;
- have in place IT systems that will effectively filter the internet without over- blocking and systems to monitor online usage;
- monitor the effectiveness of this policy;
- meet annually with the Directors and Designated Safeguarding Lead to review the effectiveness of the policy;

## Role of the Designated Safeguarding Lead

### The Designated Safeguarding Lead will:

- ensure the implementation of this and all related policies;
- attend training on and keep up to date with all developments in safeguarding and child protection, in line with recommendations from the Local Safeguarding Children Board and government guidance and legislation;
- ensure that all staff and host carers receive training in and understand all aspects of safeguarding, what constitutes child abuse, how to identify it and how to report it, including, but not limited to:
  - Physical abuse
  - Emotional abuse
  - Sexual abuse

- Neglect
  - Bullying, including cyberbullying
  - Children missing from education
  - Child sexual exploitation
  - Child criminal exploitation
  - Contextual Safeguarding
  - Domestic abuse
  - Drug and alcohol use
  - E-safety
  - Early intervention/help
  - Fabricated or induced illness
  - Faith abuse
  - Female Genital Mutilation (including mandatory reporting)
  - Forced Marriage
  - Gangs and youth violence
  - Gender based violence/ violence against women and girls
  - Human/ child trafficking
  - So-called 'honour based' violence
  - Mental health and self-harm
  - Preventing radicalisation
  - Peer on peer abuse
  - Sexting
  - Sexual violence and sexual harassment between young people (see also Appendix C);
- ensure that students understand what constitutes child abuse and how to identify it (see also Appendix C);
  - ensure staff and host carers are aware of the Policy's Guidelines When Dealing with Small Groups or Individual Students;
  - ensure all staff are aware of and comply with the Staff Code of Conduct (appendix E)
  - ensure students and staff are aware of the rules and arrangements for under 18s (appendix F)
  - ensure all centre personnel read Part One of 'Keeping Children Safe in Education';
  - ensure everyone connected with the centre is fully aware of this policy;
  - undertake advanced level training in safeguarding and child protection and renew this training at least every 2 years;
  - receive appropriate annual training updates;
  - maintain contact with the Local Safeguarding Children Board and attend forums and training where appropriate;
  - work with the PSHE coordinator to ensure safeguarding becomes an important topic for discussion with all students and collaborate on setting the scheme of work for PSHE lectures and workshops;
  - ensure that centre personnel understand their duty to not promise absolute confidentiality to a student at any time when a disclosure has been made to them, and to report any concerns;
  - ensure that visiting professionals or outside agencies understand their duty to not promise absolute confidentiality to a student at any time when a disclosure has been made to them, and to report any concerns;
  - investigate and deal with all cases of suspected or actual problems associated with safeguarding and child protection;
  - keep up to date with all new guidance on safeguarding children;
  - keep all centre personnel up to date with any changes to procedures;
  - maintain accurate, secure and up-to-date records of cases or concerns;

- ensure all confidential child protection information is stored securely in central place;
- inform parents that information is kept on their children;
- ensure that no information will be disclosed to a parent if this would put a child at risk of significant harm;
- be trained in working with all agencies;
- make child protection referrals to children's social care or if need be to the police and then to wait for a decision about the type of response required;
- take appropriate action if a child's situation does not improve after a referral has been made by pressing for re-consideration;
- record all child protection referrals;
- co-ordinate action within the centre;
- liaise and seek advice from the Local Authority Designated Officer when the need arises;
- liaise with social care and other agencies;
- organise appropriate training for centre personnel, including host carers, Deputy Designated Safeguarding Lead(s) and Directors; as outlined in the section of this policy named 'Training and Awareness Raising';
- complete and regularly update a Welfare Risk Assessment which outlines procedures in place to minimise risk to under 18s in a mixed age environment and additional welfare provision in place for all students – this should be conducted for both the centre and any residential accommodation;
- with the Centre Manager, consult the Student Forum for feedback on this policy;
- survey the students annually on the policy;
- work closely with the Centre Manager and work closely with the Safeguarding Committee on child protection;
- annually review the policy with the Centre Manager and Director of Centre Services
- ensure students:
  - feel safe and protected;
  - know how to assess risk to themselves;
  - know how to keep themselves safe;
  - know how to raise a complaint or concern;
  - know and recognise a trusted adult that they can go to and raise their concerns;
  - feel supported and protected when they raise a concern;
  - are kept informed of any actions that have been taken when they have raised a complaint;
  - feel safe from discrimination and bullying;
- are made aware of the basic safeguarding procedures in centre such as visitors signing in and wearing visitor badges;
- regularly visit the centre's Centre Manager, to ensure the policy is implemented effectively;
- report back to the Board of Directors

## Role of the Deputy Designated Safeguarding Lead(s)

### The Deputy Designated Safeguarding Lead(s) will:

- be nominated by the board and Designated Safeguarding Lead and ensure that he or she is aware of his/her responsibilities;
- undertake appropriate training in safeguarding and child protection;
- keep up-to-date with all new guidance on safeguarding children;
- work closely with the Safeguarding Committee on child protection;
- regularly visit the centre's Centre Manager, to ensure the policy is implemented effectively;
- report back to the Board of Directors

## Role of the Safeguarding Committee

### The Centre Safeguarding Committee will include:

- Centre Manager
- Centre Management Personnel
- Centre Welfare Officer
- Directors of Studies/ Senior Teacher
- Accommodation Manager(s)
- Residential Accommodation Personnel

The above list will include the DSL and DDSL(s), and will meet every session (off-season, spring and summer) to review:

- Safeguarding provision
- All elements of this policy and related safeguarding and child protection policies
- Scheduled training and awareness raising sessions and their content
- Individual students and any causing concern
- Any cases in progress
- Projects and centre run initiatives to promote safeguarding

The Oxford Spires Education Group Safeguarding Committee will include:

- DSL and/or DDSL
- Centre Managers
- Welfare Officers
- Accommodation Manager(s)

And will meet periodically to review:

- Safeguarding provision in all centres
- All elements of this policy and related safeguarding and child protection policies
- Scheduled training and awareness raising sessions and their content in all centres
- Group-wide projects and initiatives to promote safeguarding



## Role of Accommodation Staff

### The Accommodation department will:

- Work closely with the Designated Safeguarding Lead;
- Ensure that DBS checks are carried out for any host carers as follows:
  - Those hosting students under 16 years old – Enhanced DBS check carried out for every member of the household over 16 years old
  - Those hosting students aged 16/17 years old – Enhanced DBS check carried out for the main host, including 'household' check
- Ensure that host carers are made aware of and comply with this Safeguarding Policy and all related policies;
- Ensure host carers are aware of their responsibilities to students as set out in the Homestay Handbook, through induction, regular re-visits and communication and training;
- Ensure carers hosting students under 18 receive basic safeguarding training as per the requirements for centre staff, including Prevent, CSE and FGM;
- Ensure Private Fostering Arrangements are in place for student under 16 years old, in Homestay accommodation for 27 nights or longer;
- Liaise with the Local Authority regarding Private Fostering Arrangements and respond to any recommendations made;

## Role of the Local Authority

### The local authority will:

- be responsible for safeguarding and promoting the welfare of children by working in partnership with centres and other organisations;
- establish a Local Safeguarding Children Board;
- appoint the chairperson to the Local Safeguarding Children Board;
- appoint other members to the Local Safeguarding Children Board;
- have in place a local authority designated officer;
- ensure the Local Safeguarding Children Board is run effectively;
- ensure centres undertake their responsibilities for the safeguarding of children;
- have excellent links with local organisations;
- provide advice, information and guidance to families in the local authority.

## Role of the Local Authority Designated Officer (LADO)

### The Local Authority Designated Officer will:

- ensure safeguarding procedures are correctly applied and implemented throughout the local authority;
- provide advice, information and guidance to personnel in the local authority;
- provide advice, information and guidance to families in the local authority;

- be responsible for updating the local authority policy for safeguarding and child protection;
- provide training and meet the training needs of centres and other organisations;
- work closely with Social Services, the Police, Health professional and all other agencies;
- be the key link to Social Services or the Police during and following formal investigations;
- monitor the progress of cases to ensure that they follow the appropriate procedures;
- keep up to date with all changes in legislation;
- will be the local authority representative on the Local Safeguarding Children Board.

## Role of Centre Personnel, Volunteers and Host Carers

### Centre personnel, volunteers and Host Carers (for students under 18) will:

- recognise that child protection is their main responsibility and will 'always act in the best interests of the child';

### Host Carers (of under 18s)

- read Part One of 'Keeping Children Safe in Education';
- be aware of any Guidelines When Dealing with Small Groups of Individual Students;
- remember to make a written record of all verbal conversations;
- make a referral to children's social care or to the police if a child is in immediate danger or at risk of harm and then record the verbal conversation in writing;
- then inform the designated safeguarding lead that a referral has been made;
- maintain an attitude of 'it could happen here' where safeguarding is concerned';
- 'identify concerns early, provide help for children, and prevent concerns from escalating';
- speak with the designated safeguarding lead if they are unsure and then record the verbal conversation in writing;
- provide a safe environment in which students can learn;
- ensure students:
  - feel safe and protected;
  - know how to assess risk to themselves;
  - know how to keep themselves safe;
  - know how to raise a complaint or concern;
  - know and recognise a trusted adult that they can go to and raise their concerns;
  - feel supported and protected when they raise a concern;
  - are kept informed of any actions that have been taken when they have raised a complaint;
  - feel safe from discrimination and bullying;
- are made aware of the basic safeguarding procedures in centre such as visitors signing in and wearing visitor badges.
- treat students' welfare with utmost importance;
- be aware of the background of the students in their care;
- be made aware of this policy and all other safeguarding policies and procedures during induction, the centre/host personnel handbook and training;
- attend regular awareness training on a wide range of safeguarding topics;

- be aware of the name of the Designated Safeguarding Lead;
- understand the role of the Designated Safeguarding Lead;
- be trained in identifying signs of harm and abuse;
- be aware of child sexual exploitation, radicalisation and extremism;
- be aware of the effects of abuse and neglect on children;
- undertake training on responding to a child;
- be alert at all times to the signs of abuse namely physical, emotional, sexual or neglect;
- know how to report any suspected case of harm or abuse;
- report to the police and to the Designated Safeguarding Lead when a girl under the age of 18 informs them that FGM has been carried out on them or if they observe physical signs that FGM has been carried out;
- report if they suspect that FGM has been carried out or whether they consider a girl may be at risk of FGM;
- be aware they face disciplinary procedures if they fail to comply with the mandatory duty;
- report any concerns that they have about students who may be vulnerable to radicalisation;
- establish a centre and classroom environment where students feel safe to talk and where centre personnel listen to students;
- provide opportunities through the curriculum to address relevant issues and topics in order to promote their safety and well-being;
- encourage students to assess risks to themselves;
- report any concerns to the Designated Safeguarding Lead or the deputy Designated Safeguarding Lead;
- know what to do if a student makes a disclosure;
- not promise confidentiality to any student but always act in the interests of a child;
- receive support and counselling if they feel distressed from being involved with a case or incident;
- be cautious when using social networking sites and must:
  - set their profile as private;
  - not allow access to students or parents/carers;
  - avoid publishing or allowing to be published any material/comments/images that could damage their professional reputation or bring the centre into disrepute.
- not outside working hours make contact with students or parents/carers via telephone, text message, email or on social networking sites;
- not give their personal details such as mobile and home telephone numbers, home or email address;
- report to the Centre Manager or Designated Safeguarding Lead any concerns they may have about another member of staff;
- report to the Board of Directors any concerns they may have about the Centre Manager
- report to the SLT any concerns they may have about poor or unsafe safeguarding practices and procedures or they may contact the NSPCC whistle blowing helpline;
- be kept up to date with changes in procedures;
- be prepared to attend a Strategy Meeting;
- be prepared to attend a Child Protection Case Conference;
- ensure that they conduct themselves correctly at all times and do not put themselves at risk;
- be aware of the Safer Recruitment processes and checks;
- implement the centre's equalities policy and schemes;
- report and deal with all incidents of discrimination;
- report any concerns they have on any aspect of the centre community.

## Role of Students

### **Students must be made aware:**

- of basic safeguarding procedures in centre such as visitors signing in and wearing visitor badges;
- of how to keep themselves safe;
- of what child abuse means and that it is wrong;
- of the personnel that exist in centre to which they can report concerns.

Students will be surveyed on Safeguarding as part of a regular student feedback system in centre.

## Role of Parents

### **Parents/Guardians/Parents representatives are:**

- asked to work with the centre to establish good home-centre relationships;
- aware that we have a responsibility for the welfare of all our students;
- aware that we have a duty to involve Social Services if we have any concerns about a child;
- aware they will be informed of our actions

## Maintaining a Safe Level of Child Protection

- The Designated Safeguarding Lead is fully trained and aware of all issues relating to the allegations of child abuse.
- Training is provided for all staff at the start of the academic year and updated for new staff during the year. All NQT's will receive an Induction Session as part of their NQT Training Programme.
- The Designated Safeguarding Lead maintains the child protection register and the Directors of Studies are informed of all matters relating to students in their year/course groups.
- Where there is the need to monitor a student more closely, a student will be placed on the centre's Cause for Concern Register.

Supervision is made available to those staff that are involved in the management of allegations of child abuse.

## Training and Awareness Raising

Training will be organised by the centre and will take place for centre personnel, volunteer helpers, homestay carers and the board of directors:

- on induction to the centre
- during NQT induction
- throughout the academic year

All centre personnel must undertake appropriate Child Protection training at least annually including:

- child protection awareness
- recognising signs of abuse
- handling disclosures

Every year the Designated Safeguarding Lead will organise awareness raising sessions on safeguarding and child protection for all centre personnel including:

- All aspects of this policy
- Updates to legislation and key guidance
- [Keeping Children Safe in Education](#)
- [Working Together to Safeguard Children](#)
- Contextual Safeguarding
- Early Help
- Recognising and reporting/dealing with:
  - Physical abuse
  - Emotional abuse
  - Sexual abuse
  - Neglect
  - Bullying, including cyberbullying
  - Children missing from education
  - Child sexual exploitation
  - Child criminal exploitation
  - Domestic abuse

- Drug and alcohol use
- E-safety
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (including mandatory reporting)
- Forced Marriage
- Gangs and youth violence
- Gender based violence/ violence against women and girls
- Human/ child trafficking
- So-called 'honour based' violence
- Mental health and self-harm
- Preventing radicalisation
- Peer on peer abuse
- Sexting
- Sexual violence and sexual harassment between young people

At least every 2 years safeguarding leads – Centre Manager, Directors of Studies, Centre Services Manager, Welfare Officer, Accommodation Managers, Residential Accommodation Wardens – will:

- Attend a full advanced safeguarding/child protection course;

or

- Attend a refresher safeguarding/child protection course organised by an appropriate and recognised body – ideally the Local Safeguarding Children's Board or recommended by them.

Annually, safeguarding leads – Centre Manager, Directors of Studies, Welfare Officers, Accommodation Managers, Residential Personnel – will undertake appropriate updates to their training which may include:

- Attending sessions or forum meetings with the Local Safeguarding Children Board
- Online training
- Review of statutory and government guidance for safeguarding

All staff will receive appendix B and C to this policy, along with Keeping [Children Safe in Education: for centre and centre staff \(part 1\)](#) on induction and at subsequent training sessions.

## Disclosures and Barring Service Checks (including Barred List checking)

All staff are DBS checked at the centre at which they work. Their DBS check is considered valid at all Oxford Spires centres. Therefore, staff providing training, attending training, giving lectures or visiting any other of the Oxford Spires centres for any other purpose will not need a further check.

Marketing and recruitment staff are ID and DBS checked at their 'host' centre and are able to visit and work at all other Oxford Spires centres without a further check being required.

Staff working in the Central Marketing team who visit centres and have contact with students are required to undergo ID and DBS checks at one of the centres and these checks will be accepted by all Oxford Spires centres.

Enhanced disclosures will be applied to all Oxford Spires staff and confirmation of enhanced DBS check status will be obtained for staff contracted by Oxford Spires, such as transport or catering support services.

DBS disclosures will not be applied to the following as they will have very little, if any, contact with students without the supervision of DBS-checked staff, or as they will access the centre premises outside centre hours:

- Evening Cleaning Staff
- Evening Maintenance Staff

## Reporting Procedures for suspected cases of abuse

- If there are reasons to suspect that a student has been abused or neglected the member of staff must report it to the Designated Safeguarding Lead. In his or her absence the report should be made to the Deputy Designated Safeguarding Lead. If neither of these members of staff are available, then any concern should be reported to the Centre Manager;
- If the allegation is against a member of staff, the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead should follow guidelines written in the *Oxford Spires Dealing with Allegations Against Centre Personnel* policy;
- The Designated Safeguarding Lead will in the first instance discuss the concern with the Centre Manager. If the Designated Safeguarding Lead in discussion with the Centre Manager are in any doubt as to whether their concerns provide sufficient grounds for a child protection investigation, they must consult with the Duty Team Leader at the relevant Social Services;
- The Designated Safeguarding Lead should only inform the parents / carers of the student of any concerns once Social Services has been consulted and their advice sought;
- If the student discloses sexual abuse or sexual abuse is suspected the student must not be questioned and the parents must not be informed until Social Services and the Police Child Protection Team has been informed and advice given;
- Information will be shared on a 'need to know' basis and must be treated in absolute confidence. Staff must not discuss the allegation with the student, family members or colleagues;
- The Designated Safeguarding Lead must keep a written record of all contact with other agencies;
- All paperwork relating to child abuse must be kept in a locked cabinet;

## Student Confidentiality

Students may from time to time, wish to share information with staff which they feel is confidential. Though it is important that trust be established between staff and students, staff can only offer limited and not absolute confidentiality at this centre as the safety, well-being and protection of our students are the main consideration in all decisions centre personnel make.

Centre personnel must make it clear when in discussion with students or parents/carers that there are limits to confidentiality that can be offered, so that they can make informed decisions about the most appropriate person/s to talk to about the personal matters that have been disclosed.

## Dealing with Disclosure

Teachers, host carers and centre staff whom the student sees every day may be selected by an abused child as the person to whom they will make their disclosure.

- If a student makes a disclosure, then the member of the centre personnel must:
- listen to the student;
- remain calm;
- offer reassurance;
- not ask the student to remove or adjust clothing if bruises are observed;
- not ask leading questions;
- let the student speak freely;
- accept what has been told them without challenge;
- not offer opinion or criticize or lay blame;
- reassure the student at the end of the disclosure telling them that they have done the right thing;
- not promise confidentiality but inform them that other people need to be told;
- record accurately and factually what the child has said in note form;
- record observed injuries or bruises;
- submit a completed critical incident sheet to the Designated Safeguarding Lead who will seek advice from the Local Authority Designated Officer;

If a member of the centre personnel suspects that a child may be a victim of abuse then they must:

- record accurately and factually what they have seen in note form;
- submit a completed Disclosure / Incident / Child Protection Concerns Notification Form (appendix D) to the designated person;

The Designated Safeguarding Lead will then:

- further investigate and keep records of this investigation;
- decide whether to take this referral further or to monitor the situation;
- inform the person making the initial referral of his/her decision;
- prepare in readiness for a case conference/core group meeting the following information on the child:
  - attendance and punctuality data
  - academic achievement



- child's behaviour and attitude
- relationships and social skills
- appearance and presentation
- any known incidents in or outside centre
- centre contact with parents/carers

If a parent makes a disclosure to the centre, then the Designated Safeguarding Lead:

- should speak with the parent taking down all details;
- will assure the parent that the centre will take the matter seriously;
- that he/she will have to take advice from the Local Authority Designated Officer about the disclosure;
- will get back to the parent when a decision has been taken and how to proceed.

## Recording Information

Centre personnel and volunteer helpers are asked to record any concern or incident in the following way:

- Note the date
- State the facts
- Record the time
- Detail any observed injuries and bruises
- Note the place
- Note the actual words of the student
- Note the nature of the concern
- Sign the notes and hand to the Designated Safeguarding Lead

## Monitoring Students on the Child Protection Register, At Risk Register or who are the subject of investigation

Monitoring Students:

- All students who are on the Child Protection Register will have Core Group meetings and Case conferences organised by Social Services. The Designated Safeguarding Lead and any other relevant staff will attend these on behalf of the centre;
- Students are aware that these meetings take place and that the centre will be presenting a report at the meetings;
- The Designated Safeguarding Lead, Director of Studies, and the assigned Social Worker or equivalent monitors students on the Child Protection Register;
- The Designated Safeguarding Lead, Directors of Studies and assigned Social Worker also monitor students who are on the Cause for Concern register.

## Case Conferences and Core Group Meetings

The Designated Safeguarding Lead will attend:

- all Child Protection Case Conferences with the appropriate member of staff;
- all Core Group meetings once a child has been placed on the Child Protection Register.

## Definitions of Child Abuse

### Criteria for Registration and Categories of Abuse

All students and children have certain basic needs, which include:

- Physical care and protection
- Affection and approval
- Stimulation and approval
- Discipline and control that is consistent and appropriate to age
- The opportunity to gradually acquire self-esteem, confidence, independence and responsibility that is age-appropriate.

Individual cases must always be treated on their own merits however in general terms the following definition should provide the bases for action under the guidelines given in Appendix C.

## Guidelines when dealing with small groups or individual students

Below is a set of guidelines that staff should take on board when dealing with individual/small groups of students. It is important to be mindful at all times of your behaviour in relationship to individual/small groups of students and of the potential risk of an allegation.

- Whenever possible try not to be alone in a room with a student, regardless of gender. If you are on your own with a student, leave the door open and inform a colleague if possible. Always keep a safe distance between you and the student.
- Do not engage in conversations about your personal life with students.
- Keep boundaries very clear between you and students, particularly if the conversation involves relationships, emotions, and sexual content.
- Do not exchange mobile phone numbers with students. If possible do not have your mobile phone out when dealing with an individual student.
- Do not accept students as 'friends' on social networking sites such as Facebook.
- If a student wishes to disclose personal information to you, ensure that they understand that you cannot guarantee confidentiality. Do not probe a student about their personal life unless they approach you. Avoid giving advice to students about their relationships.
- Do not teach small groups of students/ individuals outside of normal lessons unless there is another member of staff in the department at that time.
- Be aware of students forming attachments to you as a teacher and keep your distance if they appear particularly needy of your attention. It is imperative that you do not appear to be encouraging the relationship, as this can often lead to misunderstandings.

- Be aware of conversations that you have with students and the need to avoid sexual innuendo at all times. Older students are particularly conscious of staff making sexual innuendos and this can place you in a very vulnerable position.
- Please discuss with the Designated Safeguarding Lead if at any time you are concerned about a situation and wish to seek advice.

## Student Consultation

We wish to consult our students and to hear their views and opinions as we acknowledge and support [Article 12 of the United Nations Convention on the Rights of the Child](#) that children should be encouraged to form and to express their views.

Student consultation is integral to our process of regular self-evaluation and continuous improvement and will take place in a variety of ways.

The methods will include:

- A Student Forum/ Council (which will meet regularly and also be consulted by the Centre Manager);
- An appointment system and means of contact with the Centre Manager and key staff members;
- Operating an 'open door' policy in centre whenever possible;
- Student Questionnaires (on a variety of matters relating to the centre and/or and social issues);
- Open Class discussion (on a variety of matters relating to the centre and/or and social issues);
- Suggestion Box (allowing anonymity if desired);

Every effort is made to provide a variety and range of consultation methods to all students. Every student who attends a course at Oxford Spires will be encouraged and given the opportunity to provide feedback on every aspect of centre life during their stay with us.

A separate policy exists for student consultation which explains these processes in more detail.

## Associated Policies and Publications

This policy has been written with reference to and in accordance with the following policies:

- Oxford Spires Centre Security Policy
- Oxford Spires Anti-Bullying Policy
- Oxford Spires Safer Recruitment Policy
- Oxford Spires Dealing with Allegations Against Centre Personnel Policy
- Oxford Spires Preventing Extremism and Radicalisation Policy
- Oxford Spires Behaviour Management Policy

This policy has been written with reference to and in accordance with the following policies and publications:

- Oxford Spires Student Handbook
- Oxford Spires Staff Handbook
- Any published Aims and Ethos of the Centre

## Monitoring the Effectiveness of the Policy

Annually the effectiveness of this policy will be reviewed, or when the need arises, and the necessary recommendations for improvement will be made to the Directors

## Equality Impact Assessment (EIA)

Under the Equality Act 2010 we have a duty not to discriminate against people on the basis of their age, disability, gender, gender identity, pregnancy or maternity, race, religion or belief and sexual orientation. This policy has been equality impact assessed and we believe that it is in line with the Equality Act 2010 as it is fair, it does not prioritise or disadvantage any student and it helps to promote equality at this centre.

This policy affects or is likely to affect the following members of the centre community (✓)	Students	Centre Personnel	Parents/ carers	Directors	Centre Visitors	Wider Centre Community
	✓	✓			✓	

Question	Protected Characteristics								Conclusion	
Does or could this policy have a negative impact on any of the following?	Age	Disability	Gender	Gender Identity	Pregnancy or maternity	Race	Religion or belief	Sexual orientation	Undertake a full EIA if the answer is 'yes' or 'not sure'	
<b>YES</b>									<b>Yes</b>	<b>No</b>
<b>NO</b>	✓	✓	✓	✓	✓	✓	✓	✓		✓
<b>UNSURE</b>										✓

Does or could this policy help promote equality for any of the following?	Age	Disability	Gender	Gender Identity	Pregnancy or maternity	Race	Religion or belief	Sexual orientation	Undertake a full EIA if the answer is 'no' or 'not sure'	
<b>YES</b>	✓	✓	✓	✓	✓	✓	✓	✓	<b>Yes</b>	<b>No</b>
<b>NO</b>										✓
<b>UNSURE</b>										✓

<b>Conclusion</b>	We have come to the conclusion that after undertaking an initial equality impact assessment that a full assessment is not required.
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# Appendices

Review Date	Primary Reviewer Name (Policy Coordinator)

## Appendix A

This **Appendix A** should be completed **annually** by the Policy Coordinator and Centre Manager with specific details of each individual Oxford Spires centre.

<b>Date of Last Review:</b>	(Date)	
<b>Date of Next Review:</b>	(Date)	
Is this policy being implemented fully, with all outlined procedures followed as prescribed?		YES / NO
All students have been advised (in a workshop, lesson, meeting or similar) of what defines child abuse and who and how to report a concern in centre.		YES / NO
All staff have been advised (in a workshop, lesson, meeting or similar) of what defines child abuse and who and how to report a concern in centre and of the centre's Guidelines when dealing with small groups or individual students.		YES / NO
All host carers accommodating students under 18 have been advised (in a workshop, meeting or similar) of what defines child abuse and who and how to report a concern in centre and of the centre's Guidelines when dealing with small groups or individual students.		YES / NO
A confidential Cause for Concern Register is managed for the centre by the Designated Safeguarding Lead.		YES / NO
It is understood that the advice of the Duty Team Leader at Social Services should be sought by the Designated Safeguarding Lead should a cause for concern be established.		YES / NO
It is understood that the Designated Safeguarding Lead may have to attend a Case Conference if necessary should a student be placed on the Child Protection Register.		YES / NO
Students, host parents, parents' representatives and parents are aware of relevant information regarding the latest policy through the Student Handbook and the online policies respectively.		YES / NO
Reporting incidents to the ISA (Independent Safeguarding Authority) The Centre agrees to report any incident to the ISA within one month of its occurrence.		YES / NO
Number of incidents In the last 12 months, the number of incidents have been reported to the ISA is	(Number)	
Student consultation on the policy will take place in	(Date)	
The Designated Safeguarding Lead, Deputy Designated Safeguarding Leads and Centre Manager have received the necessary Child Protection Level 3 Training		YES/NO

Title	Name	Date of last training	Date of next training	Level
<b>DESIGNATED SAFEGUARDING LEAD</b>				
<b>DEPUTY DESIGNATED SAFEGUARDING LEAD</b>				
<b>DEPUTY DESIGNATED SAFEGUARDING LEAD</b>				

<b>Monitoring the Effectiveness of the Policy with Students</b>	
An annual survey of the students by the Child Protection Officer on their feelings on safeguarding and safety in the centre is conducted annually.	
<b>Date of last Survey:</b>	Date:
<b>Results evaluated by:</b>	Name/Job title:
<b>I confirm that the Policy conforms with the latest versions of any regulations and guidelines referenced in the Policy document.</b>	YES / NO
<b>I confirm that annual student consultation on the policy has taken place on (date).</b>	Date:
<b>If this policy is not being implemented fully, as prescribed, please outline what you have put in place instead and the reasons behind the change...</b>	
<b>How are staff made aware of this policy?</b>	
<b>Does this policy require any specific/specialised training for staff, if yes please specify what it is and whether it has been done?</b>	
<b>Monitoring the Effectiveness of the Policy</b>	
The information in this policy and appendix will be reviewed annually by the Centre Manager, or when the need arises, and the necessary recommendations for improvement will be made by the Centre Manager to the Board of Directors.	
Please comment on the overall effectiveness of this policy – giving any suggestions or recommendations for improvement...	
<b>Coordinator:</b>	Date:
<b>Centre Manager:</b>	Date:
<b>Chair of Board of Directors</b>	Date:
<b>Name of Centre:</b>	
<b>Next Review Date:</b>	Date:

## Appendix B - List of Appointed Safeguarding Staff and Key Contacts

Oxford Spires International:  
Anglia Ruskin University, Cambridge

Safeguarding Contacts	Name	Phone
Main Centre Switchboard		+44 (0) 1865 800 290
Centre Out of Hours Emergency Number		+44 (0) 1865 800 290
Designated Safeguarding Lead	Rob McWilliams	+44 (0) 7966 153 955
Deputy Designated Safeguarding Lead	Matt Simmonite	+44 (0) 7739 750 128
Centre Manager	TBC	TBC
Local Authority Designated Officer (LADO)	Katharine Jeary & Rebecca Boswell	Katharine.Jeary@cambridgeshire.gov.uk Rebecca.boswell@cambridgeshire.gov.uk
Cambridgeshire & Peterborough MASH		01733 864 170
Social Services Referrals		0345 045 5202
Out of Hours Social Services		01733 234 724
Local Child Protection Referral Procedures		<a href="https://www.cambridgeshire.gov.uk/residents/children-and-families/children-s-social-care/safeguarding-children-and-child-protection">https://www.cambridgeshire.gov.uk/residents/children-and-families/children-s-social-care/safeguarding-children-and-child-protection</a>
Cambridgeshire Police	Cambridge Police Station	01223 358 966
NSPCC Whistle-blowing Helpline		0800 028 0285



**Oxford Spires International:  
Oxford International College, Oxford**

<b>Safeguarding Contacts</b>	<b>Name</b>	<b>Phone</b>
<b>Main Centre Switchboard</b>		+44 (0) 1865 800 290
<b>Centre Out of Hours Emergency Number</b>		+44 (0) 1865 800 290
<b>Designated Safeguarding Lead</b>	Rob McWilliams	+44 (0) 7966 153 955
<b>Deputy Designated Safeguarding Lead</b>	Matt Simmonite	+44 (0) 7739 750 128
<b>Centre Manager</b>	TBC	TBC
<b>Local Authority Designated Officer (LADO)</b>	Alison Beasley	Tel: 01865 815 956 Mob: 07833 436 649
<b>Oxford MASH</b>		0345 050 7666
<b>Social Services Referrals</b>		01865 328563
<b>Out of Hours Social Services</b>		Emergency Phone 07887 847 018
<b>Local Child Protection Referral Procedures</b>		<a href="http://www.oscb.org.uk/reporting-concerns/">http://www.oscb.org.uk/ reporting-concerns/</a>
<b>Police</b>	Police Station St Aldates	01865 841148
<b>NSPCC Whistle-blowing Helpline</b>		0800 028 0285

**Oxford Spires International:  
Brasenose College, Oxford**

<b>Safeguarding Contacts</b>	<b>Name</b>	<b>Phone</b>
<b>Main Centre Switchboard</b>		+44 (0) 1865 800 290
<b>Centre Out of Hours Emergency Number</b>		+44 (0) 1865 800 290
<b>Designated Safeguarding Lead</b>	Rob McWilliams	+44 (0) 7966 153 955
<b>Deputy Designated Safeguarding Lead</b>	Matt Simmonite	+44 (0) 7739 750 128
<b>Centre Manager</b>	TBC	TBC
<b>Local Authority Designated Officer (LADO)</b>	Alison Beasley	Tel: 01865 815 956 Mob: 07833 436 649
<b>Oxford MASH</b>		0345 050 7666
<b>Social Services Referrals</b>		01865 328563
<b>Out of Hours Social Services</b>		Emergency Phone 07887 847 018
<b>Local Child Protection Referral Procedures</b>		<a href="http://www.oscb.org.uk/reporting-concerns/">http://www.oscb.org.uk/reporting-concerns/</a>
<b>Police</b>	Police Station St Aldates	01865 841148
<b>NSPCC Whistle-blowing Helpline</b>		0800 028 0285

**Oxford Spires International:  
Sibford School, Sibford, Oxfordshire**

<b>Safeguarding Contacts</b>	<b>Name</b>	<b>Phone</b>
<b>Main Centre Switchboard</b>		+44 (0) 1865 800 290
<b>Centre Out of Hours Emergency Number</b>		+44 (0) 1865 800 290
<b>Designated Safeguarding Lead</b>	Rob McWilliams	+44 (0) 7966 153 955
<b>Deputy Designated Safeguarding Lead</b>	Matt Simmonite	+44 (0) 7739 750 128
<b>Centre Manager</b>	TBC	TBC
<b>Local Authority Designated Officer (LADO)</b>	Alison Beasley	Tel: 01865 815 956 Mob: 07833 436 649
<b>Oxford MASH</b>		0345 050 7666
<b>Social Services Referrals</b>	MASH	0345 050 7666
<b>Out of Hours Social Services</b>		0800 833 408
<b>Local Child Protection Referral Procedures</b>		<a href="#">Visit link</a>
<b>Oxfordshire Police</b>	Banbury Police Station	01865 841 148
<b>NSPCC Whistle-blowing Helpline</b>		0800 028 0285

**Oxford Spires International:  
St Edward's School, Oxford**

<b>Safeguarding Contacts</b>	<b>Name</b>	<b>Phone</b>
<b>Main Centre Switchboard</b>		+44 (0) 1865 800 290
<b>Centre Out of Hours Emergency Number</b>		+44 (0) 1865 800 290
<b>Designated Safeguarding Lead</b>	Rob McWilliams	+44 (0) 7966 153 955
<b>Deputy Designated Safeguarding Lead</b>	Matt Simmonite	+44 (0) 7739 750 128
<b>Centre Manager</b>	TBC	TBC
<b>Local Authority Designated Officer (LADO)</b>	Alison Beasley	Tel: 01865 815 956 Mob: 07833 436 649
<b>Oxford MASH</b>		0345 050 7666
<b>Social Services Referrals</b>		01865 328 563
<b>Out of Hours Social Services</b>		Emergency Phone 07887 847 018
<b>Local Child Protection Referral Procedures</b>		<a href="http://www.oscb.org.uk/reporting-concerns/">http://www.oscb.org.uk/reporting-concerns/</a>
<b>Police</b>	Police Station St Aldates	01865 841 148
<b>NSPCC Whistle-blowing Helpline</b>		0800 028 0285

**Oxford Spires International:  
Summer Fields School, Oxford**

<b>Safeguarding Contacts</b>	<b>Name</b>	<b>Phone</b>
<b>Main Centre Switchboard</b>		+44 (0) 1865 800 290
<b>Centre Out of Hours Emergency Number</b>		+44 (0) 1865 800 290
<b>Designated Safeguarding Lead</b>	Rob McWilliams	+44 (0) 7966 153 955
<b>Deputy Designated Safeguarding Lead</b>	Matt Simmonite	+44 (0) 7739 750 128
<b>Centre Manager</b>	TBC	TBC
<b>Local Authority Designated Officer (LADO)</b>	Alison Beasley	Tel: 01865 815 956 Mob: 07833 436 649
<b>Oxford MASH</b>		0345 050 7666
<b>Social Services Referrals</b>		01865 328 563
<b>Out of Hours Social Services</b>		Emergency Phone 07887 847 018
<b>Local Child Protection Referral Procedures</b>		<a href="http://www.oscb.org.uk/reporting-concerns/">http://www.oscb.org.uk/reporting-concerns/</a>
<b>Police</b>	Police Station St Aldates	01865 841 148
<b>NSPCC Whistle-blowing Helpline</b>		0800 028 0285

**Oxford Spires International:  
Oxford Brookes University, Oxford**

<b>Safeguarding Contacts</b>	<b>Name</b>	<b>Phone</b>
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<b>Centre Out of Hours Emergency Number</b>		+44 (0) 1865 800 290
<b>Designated Safeguarding Lead</b>	Rob McWilliams	+44 (0) 7966 153 955
<b>Deputy Designated Safeguarding Lead</b>	Matt Simmonite	+44 (0) 7739 750 128
<b>Centre Manager</b>	TBC	TBC
<b>Local Authority Designated Officer (LADO)</b>	Alison Beasley	Tel: 01865 815 956 Mob: 07833 436 649
<b>Oxford MASH</b>		0345 050 7666
<b>Social Services Referrals</b>		01865 328 563
<b>Out of Hours Social Services</b>		Emergency Phone 07887 847 018
<b>Local Child Protection Referral Procedures</b>		<a href="http://www.oscb.org.uk/reporting-concerns/">http://www.oscb.org.uk/reporting-concerns/</a>
<b>Police</b>	Police Station St Aldates	01865 841 148
<b>NSPCC Whistle-blowing Helpline</b>		0800 028 0285

**Oxford Spires International:  
Burford School, Burford, Oxfordshire**

<b>Safeguarding Contacts</b>	<b>Name</b>	<b>Phone</b>
<b>Main Centre Switchboard</b>		+44 (0) 1865 800 290
<b>Centre Out of Hours Emergency Number</b>		+44 (0) 1865 800 290
<b>Designated Safeguarding Lead</b>	Rob McWilliams	+44 (0) 7966 153 955
<b>Deputy Designated Safeguarding Lead</b>	Matt Simmonite	+44 (0) 7739 750 128
<b>Centre Manager</b>	TBC	TBC
<b>Local Authority Designated Officer (LADO)</b>	Alison Beasley	Tel: 01865 815 956 Mob: 07833 436 649
<b>Oxford MASH</b>		0345 050 7666
<b>Social Services Referrals</b>		01865 328 563
<b>Out of Hours Social Services</b>		Emergency Phone 07887 847 018
<b>Local Child Protection Referral Procedures</b>		<a href="http://www.oscb.org.uk/reporting-concerns/">http://www.oscb.org.uk/ reporting-concerns/</a>
<b>Police</b>	Police Station St Aldates	01865 841 148
<b>NSPCC Whistle-blowing Helpline</b>		0800 028 0285

Oxford Spires International:  
Cheltenham Ladies' College Cheltenham, Gloucestershire

Safeguarding Contacts	Name	Phone
Main Centre Switchboard		+44 (0) 1865 800 290
Centre Out of Hours Emergency Number		+44 (0) 1865 800 290
Designated Safeguarding Lead	Rob McWilliams	+44 (0) 7966 153 955
Deputy Designated Safeguarding Lead	Matt Simmonite	+44 (0) 7739 750 128
Centre Manager	TBC	TBC
Local Authority Designated Officer (LADO)	Nigel Hatten, supported by Tracy Brooks	01452 426 994 (Nigel) 01452 426 320 (Tracy)
Gloucestershire MASH		01452 426565
Social Services Referrals	Children & Family Services Helpdesk	01452 426 565
Out of Hours Social Services		01452 614 194
Local Child Protection Referral Procedures		<a href="https://www.gscb.org.uk/media/1518035/cp-flowchart.pdf">https://www.gscb.org.uk/media/1518035/cp-flowchart.pdf</a>
Police	Gloucestershire Police	01452 753 241
NSPCC Whistle-blowing Helpline		0800 028 0285



**Oxford Spires International:  
Wycliffe College Stonehouse, Gloucestershire**

<b>Safeguarding Contacts</b>	<b>Name</b>	<b>Phone</b>
<b>Main Centre Switchboard</b>		+44 (0) 1865 800 290
<b>Centre Out of Hours Emergency Number</b>		+44 (0) 1865 800 290
<b>Designated Safeguarding Lead</b>	Rob McWilliams	+44 (0) 7966 153 955
<b>Deputy Designated Safeguarding Lead</b>	Matt Simmonite	+44 (0) 7739 750 128
<b>Centre Manager</b>	TBC	TBC
<b>Local Authority Designated Officer (LADO)</b>	Nigel Hatten, supported by Tracy Brooks	01452 426 994 (Nigel) 01452 426 320 (Tracy)
<b>Gloucestershire MASH</b>		01452 426565
<b>Social Services Referrals</b>	Children & Family Services Helpdesk	01452 426 565
<b>Out of Hours Social Services</b>		01452 614 194
<b>Local Child Protection Referral Procedures</b>		<a href="https://www.gscb.org.uk/media/1518035/cp-flowchart.pdf">https://www.gscb.org.uk/media/1518035/cp-flowchart.pdf</a>
<b>Police</b>	Gloucestershire Police	01452 753 241
<b>NSPCC Whistle-blowing Helpline</b>		0800 028 0285

# Appendix C - Notice to staff – Definitions of Abuse, Dealing with Individual and Small Groups of Students and Procedure for Dealing with a Disclosure

## DEFINITIONS OF ABUSE

Before a student is placed on the Child Protection Register a conference must decide that there is, or there is a likelihood of significant harm leading to the need for a child protection plan.

Below is a detailed definition of types of abuse and the categories used for the register. They are intended to provide definitions as a guide; in some instances, more than one category of registration may be appropriate.

### NEGLECT

The persistent or severe neglect of a child or the failure to protect a child from exposure to any kind of danger, including cold or starvation, or extreme failure to carry out an important aspect of care, resulting in the significant impairment of the child's health or development, including non-organic failure to thrive.

Severe neglect is associated with major retardation of cognitive functioning as well as growth. It is recognised through a typical pattern of poor growth, poor hygiene, withdrawal and in extreme cases a pseudo-autistic state, all of which can rapidly reverse in alternative care.

Although neglect has one of the most pervasive effects on development and is one of the most frequent forms of abuse, it is an area which is frequently neglected by professionals. Like parents, professionals can feel overwhelmed and hopeless by large families living in squalid conditions.

#### Signs to look out for:

- dirty unkempt appearance of child, in overall poor condition;
- thin wispy hair;
- Underweight child, diarrhoea may indicate poor nutrition;
- an undernourished child may be unduly solemn or unresponsive, or may be overeager to obtain food;
- an under-stimulated child may not reach expected milestones;
- behaviour and developmental difficulties that cannot be explained by clinical factors.

#### Associated Factors:

Neglected children frequently come from homes where there is:

- a parent who is lonely, isolated, unsupported or depressed;
- poor inter-parental relationship / domestic violence;
- a parent who is abusing drugs or alcohol;
- a large number of children living in cramped or very poor conditions.

**Action to be taken:**

If a teacher has concerns about the well-being of a child in his / her class, a discussion should take place with the Designated Safeguarding Lead, records should be kept, and when appropriate Social Services staff are informed by the Designated Safeguarding Lead.

**PHYSICAL ABUSE (NON-ACCIDENTAL INJURY)**

Physical injury to a child, including deliberately poisoning, where there is definite knowledge, or a reasonable suspicion, that the injury was inflicted or knowingly not prevented.

**Location of injury:**

It should not be assumed that an injury to a part of the body normally vulnerable to accidental injury has necessarily been caused accidentally – it could be non-accidental. All injuries to children, which do not easily come into the category of normal bumps and scrapes, should be seen by a doctor.

Certain parts of the body are more commonly subjected to non-accidental injury. These include the upper arm, where a child may be gripped or shaken, the back, and the buttocks. Multiple injuries of various types, ages and location are common features of physical abuse.

Most non-accidental injuries leave marks on the body. PE teachers and swimming instructors are therefore key people in the identification of this form of abuse, as they regularly see the children partially dressed.

**Signs to look out for:**

- children who show a reluctance to undress or to expose parts of their bodies should be monitored as children who may have suffered physical injury;
- unexplained absences;
- physical signs of injury;
- unexplained or confused accounts of how an injury occurred;
- explanation of an injury which appears to be inappropriate to the nature and age of the injury.

## **Common Medical / Physical Factors Associated with Physical Abuse:**

### **a) Bruising**

- facial bruising around the mouth and ears;
- groups of small bruises;
- black eyes without a forehead injury, particularly if both eyes are affected;
- weal marks or outline of bruising (e.g. hand mark);
- bruising of soft tissue with no obvious explanation (most bruises occur on bony protuberances such as the temple or shin);
- bruises on the back, back of legs, stomach, chest or neck;
- bruises or cuts to mouth or tongue (e.g. split frenulum);
- pinch marks are found in pairs and may be seen on the back, buttocks, arms or cheeks;

### **b) Bites**

- bites leave clear impressions of teeth and some bruising;
- parents sometimes claim that bites have been made by other children or animals. It is therefore important to check the size and shape of the injury. If the impression is more than 3cms across, it will have been caused by an adult or adolescent. Bites can be inflicted almost anywhere on the body;
- Bites are never accidental.

### **c) Burns and Scalds**

Children will sometimes suffer minor burns through hot irons etc, but it is uncommon for multiple burns to be caused accidentally:

a cigarette burn is characteristically round, but may have a tail when dragged against the skin, and is surrounded by an area of inflamed skin;

- cigarette burns can be found in groups and can be found on any part of the body;
- scalds from boiling water may result from lack of supervision, or non-accidentally;
- a child is very unlikely to sit down willingly in very hot water; therefore he cannot scald a bottom accidentally without also scalding the feet;

burns and / or scalds are particularly worrying as a degree of sadism may be involved when such injuries are inflicted;

### **Associated Factors:**

- injuries not consistent with explanation given by parent (even if agreed by the child);
- circumstances where parent delays seeking medical advice;
- a history of repeated injuries or presentation to the Accident & Emergency Department;
- consent for a medical refused by parent;
- desire of a parent to attribute blame elsewhere;
- distant or mechanical handling of the child by the parents.

### **Action to be taken:**

If a teacher has concerns that a student in her / his class may be suffering from physical abuse, the Designated Safeguarding Lead should be informed, and detailed records kept (including dates injuries noted). The Designated Safeguarding Lead will decide if concerns should be shared with parents, and when appropriate, Social Services staff and a designated doctor should be informed.

## **SEXUAL ABUSE**

The involvement of dependent, developmentally immature children and adolescents in sexual activities they do not truly comprehend and to which they are unable to give informed consent, or that violate the social taboos of family roles.

The traumatic effects of child sexual abuse can be far-reaching and enduring, impacting on a child's cognitive, behavioural and social development. The earlier the abuse occurs, the more adversely subsequent stages of development may be affected. The longer the abuse continues, the more extensive it is e.g. involving penetrative abuse, the greater the number of developmental stages that abuse continues through, the more disturbed the child is likely to be. Children who have suffered chronic long-term sexual abuse tend to have very negative feelings about themselves and all aspects of their relationships.

### **What is sexual abuse?**

Sexual abuse can be one or more of the following:

- rape – genital and / or oral intercourse;
- digital penetration or penetration with an object;
- mutual masturbation;
- inappropriate fondling;
- taking pornographic photographs or exposing the child to pornographic materials;
- forcing the child to observe others involved in sexual activities;
- sadomasochistic activities.

Both boys and girls can suffer from sexual abuse. Both men and women can be perpetrators – boys and girls who disclose sexual abuse from a female perpetrator are often met with disbelief. It is therefore important to listen to what a child says without being judgemental.

Abusers can be parents, friends, teachers, child-care workers, clergymen or strangers. Warning children about Stranger Danger should only form part of the child protection programme.

### Signs to look out for:

- a child who demonstrates inappropriate sexual interest and activity, through play or drawings;
- sexualised behaviour, masturbation and sex play which often leaves the peer group confused or embarrassed;
- a child having excessive preoccupation with, or precocious knowledge of adult sexual behaviours;
- a child who shows a marked fear of adults, usually men, but occasionally men and women;
- a child who presents as depressed and where there may be instances of drug or alcohol abuse, suicide attempts or running away;
- a child who suddenly starts to wet or soil;
- a child who takes over the role of wife / mother within the family;
- a child whose concentration and academic performance suddenly deteriorates;
- a child who avoids medical examination or is reluctant to change for PE;
- a child who has low self-esteem and few friends;
- aggressive behaviour from a normally quiet child, or withdrawn behaviour from a normally boisterous child;
- frequent unexplained absences or lateness;
- a child who talks of nightmares and being unable to sleep;
- a child who may be excessively tired;
- fire raising;
- pregnancy in young teenagers where the identity of the father is vague or unknown;
- recurrent urinary tract infections;
- signs of sexually transmitted infections and overall dishevelled appearance;

### Action to be taken

If any teacher has concerns that a student in her / his class may be suffering from sexual abuse in any form, they must discuss this with the Designated Safeguarding Lead, who should then discuss it with Social Services personnel. Parents should not be informed at the early stage of what action has been taken, as this may serve to quieten the student, putting her / him at even greater risk.

Detailed records should be kept, including dates and circumstances surrounding discussions.

## EMOTIONAL ABUSE

Actual or likely severe adverse effect on the emotional and behavioural development of a child caused by persistent or severe emotional ill treatment or rejection. All forms of abuse involve some emotional ill treatment. This category should be used only where it is the sole form of abuse.

Emotional or psychological abuse can be defined as the destruction of the child's competence to be able to function in a social situation. The child may be denied appropriate contact with peers within or outside of centre, and be forced to take on a particular role in relation to parents, which is detrimental to the child's ability to function appropriately in social contexts.

This type of abuse is very difficult to identify as there are no physical signs – symptoms are usually apparent via a child's behaviour and demeanour.

It is important to note that the emotional / psychological abuse is present in all other forms of abuse, but this category is only used when it is the sole form of abuse.

### Signs to look out for:

- a child may be inducted into a parental care-taking role and not be encouraged to be involved with appropriate play;
- a child may be used as a parent's confidant to a degree that is harmful to the child's psychological development;
- a child may be ignored, rejected or denigrated by a parent;
- a child may be terrorised by a parent or others so that she / he is overly fearful and watchful;
- a parent who is unable to be responsive to a child's emotional needs, who may be emotionally distant and / or excessively negative and hostile a child (usually of a mentally ill or disturbed parent) who is inducted into a parent's delusionary state or paranoid beliefs;
- a student who is cripplingly over-protected and not given freedom to act at an age appropriate level;
- a parent who provides only conditional love with threats of withdrawal of love.

Behavioural definitions are very difficult to quantify because a) most children experience some of these acts from time to time, and b) because the impact of a single or seldom occurring act of abuse will not have severe and harmful effects. The harm of emotional maltreatment results from the cumulative effects of repeated acts of psychological abuse.

### **Associated Factors:**

Children who suffer from emotional abuse frequently come from homes where there is:

- a mentally ill or disturbed parent;
- drug or alcohol abuse;
- a parent who is socially isolated, unsupported or depressed, or conversely, a parent who has a very active social life with very little time or energy to give to child care;
- a parent who has poor social skills, who may have learning difficulties and lack of knowledge about children's age appropriate needs;
- a parent who has suffered severe abuse within her / his own childhood;
- a household where there is 'adult on adult' domestic violence;

Many parents who emotionally abuse their children are unaware that what they are doing is harmful. Because of their own life experiences, they may have a distorted view of parenting and their role as a mother / father.

### **Action to be taken:**

If a teacher is concerned that a student in her / his class is being emotionally maltreated, it should be reported to the Designated Safeguarding Lead, detailed records should be kept, and when appropriate, Social Services staff informed by the Designated Safeguarding Lead.



## FEMALE GENITAL MUTILATION (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM.

### Signs to look out for:

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, at marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

It is believed that FGM happens to British girls in the UK as well as overseas (often in the family's country of origin). Girls of centre age who are subjected to FGM overseas are thought to be taken abroad at the start of the centre holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies.

### There can also be clearer signs when FGM is imminent:

- It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin;
- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it;
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman';
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk;
- Parents state that they or a relative will take the child out of the country for a prolonged period;
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent;
- Parents seeking to withdraw their children from learning about FGM.

### **There are a number of indications that a girl or woman has already been subjected to FGM:**

- A girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating.
- A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl or woman may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from centre or centre.
- A prolonged absence from centre or centre with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl or woman may be particularly reluctant to undergo normal medical examinations.
- A girl or woman may confide in a professional.
- A girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear.
- A girl may talk about pain or discomfort between her legs.

### **Action to be taken:**

If staff have a concern, they should activate local safeguarding procedures, and existing national and local protocols for multi-agency liaison with police and children's social care should be followed.

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. The Mandatory reporting duty will commence in October 2015.

Once introduced, teachers must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the centre's designated safeguarding lead and involve children's social care as appropriate.

## CHILD SEXUAL EXPLOITATION

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.

### Signs to look out for:

- going missing for periods of time or regularly coming home late;
- regularly missing centre or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse;
- displaying inappropriate sexualised behaviour.

Practitioners should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

### **Associated Factors:**

In assessing whether a child or young person is a victim of sexual exploitation, or at risk of becoming a victim, careful consideration should be given to the issue of consent. It is important to bear in mind that:

- a child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching;
- sexual activity with a child under 16 is also an offence;
- it is an offence for a person to have a sexual relationship with a 16 or 17 year old if they hold a position of trust or authority in relation to them;
- where sexual activity with a 16 or 17 year old does not result in an offence being committed, it may still result in harm, or the likelihood of harm being suffered;
- non consensual sex is rape whatever the age of the victim;
- if the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed.

Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18 years and not just those in a specific age group.

### **Action to be taken:**

If a teacher is concerned that a student in her / his class is being engaged in CSE, it should be reported to the Designated Safeguarding Lead, detailed records should be kept, and when appropriate, Social Services staff informed by the Designated Safeguarding Lead.

## PEER-ON-PEER ABUSE

Safeguarding issues can present via peer-on-peer abuse, whereby a student is subject to significant harm by another student or students.

Peer-on-peer abuse usually manifests as one, or a combination, of the following:

**Bullying:** if a child is suffering or at risk of significant harm, a bullying incident should be addressed as a child protection concern. Bullying can take different forms, including cyberbullying, racist and religious bullying and homophobic bullying. Some types of behaviour or communication may constitute a criminal offence.

**Domestic violence:** teenage relationship abuse involves controlling, coercive, threatening behaviour, violence or abuse between intimate partners or family members aged 16 or over. It can be psychological, physical, sexual, financial and/or emotional.

**Child sexual exploitation (CSE):** defined as an individual or group taking advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity. This may involve some form of exchange. CSE:

- Can be perpetrated by other children;
- May have occurred even if the sexual activity appears consensual; for example, if the child is legally old enough to consent but lacks the freedom or capacity to do so. This applies if the child is fearful or under the influence of harmful substances;
- Does not always involve physical contact – it may also occur through technology;
- Can sometimes be mistaken for ‘normal adolescent behaviours’;
- Is never the victim’s fault, even if there is some form of exchange.

Harmful sexual behaviour: involves a child engaging in discussions or acts that are inappropriate for their age or stage of development, whether online or offline. It includes sexualised language or role play, viewing pornography, sexual harassment and sexual violence (see below). It also includes ‘sexting’, whereby a sexually explicit text, image or video is sent or received. Note: it is a criminal offence to possess or distribute sexual content of under-18s.

**Sexual harassment:** unwanted conduct of a sexual nature, which can include:

- Sexual comments
- Sexual “jokes” or taunting
- Physical behaviour
- Online sexual harassment

Sexual harassment creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence

**Sexual violence:** rape, assault by penetration or sexual assault, as defined by the Sexual Offences Act 2003. Note: the age of consent is 16, and a child under 13 can never consent to sexual activity.

**Serious youth violence:** this form of abuse applies to victims aged 1-19 who are subject to offences such as violence, sexual offences, robbery, or gun or knife crime. This may occur within the context of gang activity.

### **Signs to look out for:**

Peer-on-peer abuse is a complex issue and will have varied warning signs. However, you should be alert to:

- Changes in behaviour or demeanour; for example, a child becoming withdrawn
- Signs of depression or anxiety
- Avoidance of particular individuals
- Unexplained injuries
- Unusually poor performance at centre
- Sudden development of sexualised behaviour or language
- Exclusion or isolation from peers
- Acts of servitude

### **Associated Factors:**

While peer-on-peer abuse can affect all children, research shows that some are particularly vulnerable:

- Young people aged 10 or over
- Girls and young women, with boys and young men more likely to be identified as abusers
- Boys and young men in gang-affected neighbourhoods
- Those with a history of abuse within their families
- Young people in care
- Those who have experienced loss through bereavement
- Children with special educational needs and disabilities

Studies have also found that black and ethnic minority children are often under-identified as victims and over-identified as perpetrators.

## CHILD CRIMINAL EXPLOITATION/ TRAFFICKING

Criminal exploitation of children is geographically widespread. The majority of child trafficking involves movement across borders; however, it can also take place within the UK. Exploitation may include:

- Sexual exploitation
- Domestic servitude or labour
- Involvement in criminal activity (for example, pick-pocketing or cannabis farming)

While some children are coerced, many are tricked through promises of education or respectable work. Children are considered trafficking victims regardless of whether they have been forced, deceived, or have submitted willingly. This is because anyone under the age of 18 cannot provide informed consent.

### Signs to look out for:

A young person is unlikely to directly disclose their situation for fear of repercussions or a lack of understanding. However, there are a number of signs that may indicate a student is a victim of trafficking.

They may:

- Show little evidence of a relationship with their carer, or be overly dependent
- Have a very low level of English
- Be reluctant to share contact details of themselves or carers/relatives in the UK
- Allude to living in unsatisfactory accommodation, or with a number of unrelated children
- Show signs of other types of abuse (for example, physical and sexual)
- Go missing for periods or have a suspicious or incomplete history
- Indicate that they are required to perform excessive chores
- Communicate concerns about money
- Have low self-esteem, and feelings of isolation, stress or fear
- Lack trust in adults and appear fearful of authorities
- Have poor concentration
- Become anti-social
- Display symptoms of substance dependence

### Associated Factors:

Children are trafficked for a range of reasons but there are a number of risk factors, such as:

- Poverty
- Cultural attitudes
- Lack of education
- Children in private fostering arrangements (not arranged by the centre)
- Dysfunctional families

## MENTAL HEALTH

Mental health is a broad issue and includes a wide range of disorders. Therefore, a large spectrum of symptoms is possible. Note that behavioural changes do not necessarily point to mental health problems – they may be temporary and caused by a negative experience or distressing life event. However, persistent disruptive or withdrawn behaviour can indicate an underlying problem.

### Signs to look out for:

- Severe behaviour problems
- Persistent or severe anxiety
- Feelings of sadness that dominate and interfere with the student's life
- Persistent and severe inattentiveness or impulsiveness
- Worries about weight that dominate the student's life
- Unusual eating patterns
- Substance misuse
- Self-harm (for example, overdosing, hitting, cutting or burning oneself)

### Associated Factors:

Certain individuals and groups are more at risk of developing mental health problems, these include, but are not limited to:

- Looked after children
- Young people with learning difficulties
- Young people on the autism spectrum
- Young people from disadvantaged backgrounds
- Young people from cultures where mental health is not discussed/ recognised

There are also risk factors within the family such as abuse, bereavement, and parental psychiatric illness. You should also be mindful of risks within the centre environment such as bullying, poor relationships and discrimination.



## DOMESTIC VIOLENCE & RELATIONSHIP ABUSE

The government's definition of domestic violence and abuse is:

"Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality."

Witnessing domestic violence is child abuse and can seriously harm children and young people. Children who live in homes where there's domestic violence are also likely to be at risk of other types of abuse. Teenagers can also become victims of domestic abuse in their own relationships.

### Signs to look out for:

It can be difficult to tell if domestic abuse is happening. However, young people who witness domestic abuse may:

- Become withdrawn or aggressive
- Display anti-social behaviour such as bullying or vandalism
- Suffer from depression, anxiety or fear of abandonment
- Struggle with centre
- Suddenly behave differently
- Have physical ailments caused by stress
- Be frequently tired

Common signs of relationship abuse include:

- Withdrawing from their circle of friends
- Not doing as well at centre, or missing centre altogether
- Constantly checking their phone
- Being withdrawn and quieter than usual
- Being angry and becoming irritable when asked how they are
- Making excuses for their boyfriend or girlfriend
- Having unexplained scratches or bruises
- Showing changes in mood or personality
- Using drugs or alcohol
- Symptoms of post-traumatic stress disorder (PTSD)

Risk factors include a family history of domestic violence, being a part of violent friendship groups and having an older partner.

## SEXTING

'[Sexting](#)' can include sending or posting sexually suggestive images using mobiles or the internet. It can also include writing and sharing explicit messages. Creating and sharing sexual photos and videos of under 18s is illegal. This includes images of yourself if you are under 18. Sexting may also be a sign that a student is being groomed.

### Signs to look out for:

Students may:

- Show signs of distress, for example, being withdrawn, aggressive, or lacking in confidence
- Perform poorly in centre without a reason
- Make changes to try and fit in; for example, by changing their appearance
- Self-harm
- Display nervous or secretive behaviour when using their mobile phone or a computer
- Display other inappropriate sexual behaviour

Students may be more vulnerable if they are looked after, have special educational needs (SEN), or a disability, or have been victims of abuse.

## FAITH ABUSE

Faith abuse is child abuse linked to faith or belief. This includes:

- Belief in concepts of witchcraft and spiritual possession, demons or the devil acting through children or leading them astray, the evil eye or djinns and dakini;
- Ritual or muti-murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies;
- Use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation;
- Belief that children's bad behaviour has brought about bad fortune.

### Signs to look out for:

Common features where faith or belief is a factor in abuse include:

- A wider social or community consensus that witchcraft exists
- A faith leader or other influential figure promoting the belief or methods of resolving the supposed problem by harming children
- A belief that the child is the victim of a supernatural force and that abuse is a means of saving the child or saving others from harm. Parents/carers can be key perpetrators and may believe they are doing the right thing
- Children being scapegoated for misfortune that has happened in the family, for example, unemployment or poverty and accused of having caused the misfortune by supernatural means

### Associated Factors:

Children are most likely to become victims if they are already vulnerable, unprotected, or can be identified as outsiders. These include those:

- With a disability including autism, epilepsy, dyslexia
- With albinism
- Living away from home in private fostering situations, domestic servitude situations, or with a step-parent (with one of the natural parents absent or dead)
- Whose parents have been branded as witches
- Who are seen as "naughty" or have challenging behaviour
- Who are precocious and/or left handed
- Living within a polygamous setting

## FORCED MARRIAGE

A forced marriage is a marriage in which “one or both spouses do not consent to the marriage but are coerced into it”. Coercion can include “physical, psychological, financial, sexual and emotional pressure. In the cases of some vulnerable adults who lack the capacity to consent, coercion is not required for a marriage to be forced”. It is recognised as a form of abuse in the UK

### Signs to look out for:

There is no ‘typical’ victim of forced marriage. It can happen to men and women, although most of the reported cases involve women and girls aged between 16 and 25. People facing forced marriage may become anxious, depressed and emotionally withdrawn, and may have low self- esteem.

### Associated Factors:

Other indicators include:

- Absence and persistent absence from centre
- Request for extended leave of absence and failure to return from visits to their country of origin
- Fear about forthcoming centre holidays
- Surveillance by siblings or cousins at centre
- Decline in behaviour, engagement, performance or punctuality
- Sudden announcement of engagement to a stranger
- Prevented from progressing to further/higher education
- Eating disorders
- Self-harm or attempted suicide

## GANGS & YOUTH VIOLENCE

A gang is typically a noticeable group of individuals that spends time in public and engages in criminal activity and violence. The group may also be territorial or in conflict with other gangs.

Young people involved in gangs have an increased risk of experiencing violence and other types of abuse.

Gang crime and serious youth violence is also often synonymous with knife crime. It is illegal to carry knives and prohibited firearms to use as weapons. A longer sentence may be served if an offender was or is part of a gang.

Signs to look out for:

- Troublesome and highly daring behaviour
- Positive attitude toward delinquency
- Previously committed offences
- Involvement in anti-social behaviour
- Substance use
- Aggression
- Running away and truancy
- Peers involved in crime or anti-social behaviour

## DEALING WITH INDIVIDUALS OR SMALL GROUPS OF STUDENTS

Below is a set of guidelines that staff should take on board when dealing with individual/small groups of students. It is important to be mindful at all times of your behaviour in relationship to individual/small groups of students and of the potential risk of an allegation.

Staff should take necessary precautions in order to minimise the opportunity for an allegation to be made against groups of students. It is important to be mindful at all times of your behaviour in relationship to individual/small groups of students and of the potential risk of an allegation.

- Whenever possible try not to be alone in a room with a student, regardless of gender. If you are on your own with a student, leave the door open and inform a colleague if possible. Always keep a safe distance between you and the student.
- Do not engage in conversations about your personal life with students.
- Keep boundaries very clear between you and students, particularly if the conversation involves relationships, emotions, and sexual content.
- Do not exchange mobile phone numbers with students. If possible, do not have your mobile phone out when dealing with an individual student.
- Do not accept students as 'friends' on social networking sites such as Facebook
- If a student wishes to disclose personal information to you, ensure that they understand that you cannot guarantee confidentiality. Do not probe a student about their personal life unless they approach you. Avoid giving advice to students about their relationships.
- Do not teach small groups of students/ individuals outside of normal lessons unless there is another member of staff in the department at that time.
- Be aware of students forming attachments to you as a teacher and keep your distance if they appear particularly needy of your attention. It is imperative that you do not appear to be encouraging the relationship, as this can often lead to misunderstandings.
- Be aware of conversations that you have with students and the need to avoid sexual innuendo at all times. Older students are particularly conscious of staff making sexual innuendos and this can place you in a very vulnerable position.
- Please discuss with the Designated Safeguarding Lead or Child Protection Officer if at any time you are concerned about a situation and wish to seek advice.

## DEALING WITH A DISCLOSURE

### PROCEDURES ADOPTED

If a disclosure is made to you by a student then:

- Remain calm
- Take what the student says seriously
- Reassure the student that they were right to tell you
- Keep questions to a minimum
- Let the student talk
- Do not promise confidentiality
- Do not investigate
- Do not ask leading questions
- Do ask the student to repeat the disclosure
- Make a note of the information given by the student. Your notes should include:
  - the student's name, age and date of birth
  - date and time of the disclosure
  - use the student's words to report what the student told you
  - description of any visible bruising or injuries
  - any changes in behaviour
  - details of any witnesses
  - any contact with parents
  - date and sign your report
- Please complete appendix D to this policy '**Disclosure / Incident / Child Protection Concerns Notification Form**' (part A) with the above notes
- Inform the student that you need to pass on the information
- Inform the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead (Director of Studies)
- Give them your report – outlined using form: appendix D to this policy '**Disclosure / Incident / Child Protection Concerns Notification Form**' (part A)
- If you do not feel able to inform the DSL, DDSL, Centre Manager or member of the Board of Directors, contact the LADO (Local Authority Designated Officer) directly (details in appendix B of Oxford Spires Safeguarding and Child Protection Policy)

The Designated Safeguarding Lead will decide, in coordination with the Centre Manager, a suitable course of action which may include:

- Contact Social Services or other external agencies
- Social Services will inform him/her of what action will be taken
- If the matter is to be investigated, you will be informed if further information is needed from you and of your further involvement with the case

## INFORMATION TO BE PROVIDED TO CENTRE PERSONNEL

- Safeguarding & Child Protection policy
- Centre Security policy
- Safeguarding procedures
- Keeping Children Safe in Education Part 1



## Appendix D - Disclosure / Incident / Child Protection Concerns Notification Form

# CONFIDENTIAL

### Part A – to be completed by person raising concern

<b>Date and time of incident:</b>		<b>Date and time of disclosure</b>	
<b>Name of child:</b>		<b>Age and Date of birth of child:</b>	
<b>Name and role of person completing form (part A):</b>		<b>Name and role of person child disclosed to/ reporting C.P. incident/ concerns</b>	
<b>Why are you concerned about this student?</b>			
<b>Please provide a description of any incidents/conversations and the dates they occurred. You must make clear what is fact and what is opinion or hearsay. You must not ask the student leading questions or try to investigate the concern yourself.</b>			
<b>What have you observed and when? (This relates to anything you have personally witnessed including bruises or injuries to a student - however staff should not ask students to remove or alter clothing to view injuries or bruises.</b>			
<b>What have you been told and when? (Write here anything you have been told by the student or any other person. Be clear about who has said what).</b>			

<b>What have you heard and when? (This may be third-party information that is relevant but as yet unsubstantiated).</b>			
<b>If an allegation has been made, give any details you have about the alleged abuser</b>			
<b>Any other details of disclosure by child / incident / child protection concerns:</b> This should include only factual information, using the words of the student(s) where possible, including dates and times, with as much detail as possible.			
<b>Action taken by person(s) above (if any):</b>			
<b>Signed:</b>		<b>Date:</b>	
<b>This form was handed to (for example: DSL or Deputy DSL):</b>			
<b>Name:</b>			
<b>Role:</b>			
<b>Date:</b>			

## Part B – to be completed by Designated Safeguarding Lead or Deputy DSL

Date of notification to Designated Safeguarding Lead / deputy:		Name of Designated Safeguarding Lead / deputy:	
<b>Details of decisions / actions by Designated Safeguarding Lead / deputy:</b>			
<b>Reason(s) for these decisions or actions by Designated Safeguarding Lead / deputy:</b>			
<b>Notes of feedback between Designated Safeguarding Lead / deputy and the person who raised this child protection concern, including date of feedback:</b>			
<b>Have Local Authority been notified?</b> (LADO, Children’s Services, Social Services, LSCB etc) <b>Name and contact number:</b> <b>Date:</b>			
<b>Have Police been notified?</b> <b>Name and contact number:</b> <b>Date:</b>			
<b>Have any persons involved been notified to the DBS (for addition to the Barred List), if necessary?</b> <b>Date:</b>			
<b>Have any other organisations been notified?</b> (Health, NSPCC, Private Fostering Team, counselling services etc) <b>Name and contact number:</b> <b>Date:</b>			
<b>Has the Nominated Ops Team Safeguarding Lead (Matt Simmonite) been notified?</b> (or in his absence Owen McGovern)			

<b>Feedback from Local Authority and action taken/ to be taken:</b>			
<b>Feedback from other external agencies and action taken/ to be taken:</b>			
<b>Tick to confirm added to Child Protection Register:</b> <input type="checkbox"/>			
<b>Date for review:</b>			
<b>Name of person(s) to review:</b>			
<b>Notes of review (including dates and times and those involved):</b>			
<b>Signed:</b>		<b>Date:</b>	
<b>Name:</b>		<b>Role:</b>	



## Appendix E – Staff Code of Conduct

### Oxford Spires Staff Code of Conduct

In addition to standards required by Common Law, Oxford Spires Centres expects standards of conduct from employees which safeguard students and creates and maintains an ethos of mutual respect, openness and fairness that reflect the stated 'Aims of the Centre'. (see also Oxford Spires HR Policy Manual)

In order to maintain and promote a positive working culture and the aims of Oxford Spires

Centres, employees are expected to:

- work together to create a centre culture that is based on mutual and appropriate respect;
- create and maintain a good and open relationship with students' parents and their representatives;
- create a positive classroom environment where all children are respected and valued;
- take care of their physical and mental well-being by maintaining a healthy work-life balance;
- treat resources responsibly and if possible, reduce, re-use and recycle.

### Staff/Student Contact

As a general rule, staff should avoid unnecessary contact with students outside centre.

- They should not give students their home address, mobile or home phone number, or non-centre e-mail address without good cause. Thank you letters to students should not contain these personal details
- They should not follow students or be followed by students on social media, except via Oxford Spires own social media forums
- They should not make arrangements to meet students, individually or in groups, outside centre other than on centre trips authorised by the Centre Manager
- They should not give a student a lift in their own vehicle unless they have permission from the Centre Manager
- They are advised not to attend private student parties or social events
- If a staff member finds they are in a social situation where students are present, whether centre-run or otherwise, they should ensure their behaviour will not reflect poorly on theirs or the centre's reputation
- When chaperoning centre run activities or excursions, staff should not consume alcohol
- Under no circumstances should staff engage in romantic or sexual relationships with students

### Dealing with Small Groups or Individual Students

- Whenever possible staff should try not to be alone in a room with a student, regardless of gender. If they are on their own with a student, they should leave the door open and inform a colleague if possible. Staff should always keep a safe distance between them and the student
- They should not engage in conversations about their personal life with students
- They should keep boundaries very clear between themselves and students, particularly if the conversation involves relationships, emotions, and sexual content
- If a student wishes to disclose personal information, they should ensure that the student understands that they cannot guarantee confidentiality. They should not probe a student about their personal life and should avoid giving advice to students about their relationships.

- They should not teach small groups of students/ individuals outside of normal lessons unless there is another member of staff in the department at that time.
- Staff should be aware of students forming attachments to them as a teacher and keep their distance if they appear particularly needy of their attention. It is imperative that they do not appear to be encouraging a relationship, as this can often lead to misunderstandings
- Staff can discuss with the Designated Safeguarding Lead or Child Protection Officer any concerns or questions

## Language

- Staff should not swear, blaspheme or use any sort of offensive language in front of students
- They should not use language, which is discriminatory and demeaning in relation to gender, religion, ethnicity, sexual orientation, disability or age.
- Staff should not make sexual innuendos or any comments of a sexual nature (other than in the context of the curriculum as specified in Schemes of Learning)

## Physical Contact

In nearly all cases physical contact between students and staff is inappropriate. The only possible circumstances where physical contact may occur are outlined below:

- Positive Student Restraint (see also Oxford Spires Behaviour and Discipline Policy)
- Action taken in self-defence or in an emergency (as above)

Contact in other situations:

- Some physical contact may be necessary to demonstrate exercises or techniques during PE, drama or sports coaching
- Touching may also be appropriate where a student is in distress and needs comforting or if a member of staff has to give first aid. Staff should use their own professional judgement when they feel a student needs this kind of support and should be aware of any special circumstances relating to the student. Particular care must be taken in instances which involve the same student over a period of time

If staff still feel it proper or necessary for physical contact to occur, then the following guidelines must be observed.

- Explain the intended action to the student;
- Do not proceed with the action if the student appears to be apprehensive or reluctant, or if you have other concerns about the student's likely reaction
- Ensure that other students or colleagues are present

## Gifts

- Staff should not give gifts to individual students; small gifts such as confectionary to a whole group or as part of an organised classroom activity are acceptable
- Students may want to give staff gifts on special occasions or as a leaving gift, which is acceptable; however, staff should be wary of students forming inappropriate attachments to them and giving regular or very valuable gifts – where this occurs staff should inform their line manager

## Appendix F - Under 18s Guide

### At Centre

<b>ALL under 18</b>	Oxford Spires Centres run courses for junior students, year-round from facilities and venues that also have adult students studying. Therefore, your child will (in some cases) study in an environment where both adult and junior students share facilities.
<b>Under 16</b>	Students under 16 years old will study in classes with students under the age of 18, but not with adult students.
<b>16 and 17</b>	Students aged 16 or 17 years old are likely (in some cases) to study in classes with adult students.

### Homestay Accommodation

<b>Under 16</b>	<p>It is Oxford Spires policy to place students under 16 and staying for 27 nights or longer, in a homestay under a Private Fostering Agreement, in order to ensure the highest level of support is available to them. The main host and all members of their household are required to undergo a criminal record check (called an Enhanced Disclosures and Barring Service check) to ensure their suitability to care for younger students.</p> <p>Private Foster carers are also required to liaise with Social Services (part of the local government authority) regarding care for under 16s. It is not Oxford Spires policy to place students under the age of 16, with students over the age of 18.</p>
<b>16 and 17</b>	<p>In homestay accommodation for students aged 16 or 17 the main host and all members of their household are required to undergo a criminal record check (called an Enhanced Disclosures and Barring Service check) to ensure their suitability to care for younger students.</p> <p>It is not Oxford Spires policy to place students under the age of 18 with students over the age of 18.</p>

### Residential Accommodation

<b>Under 16</b>	Only available on short courses as part of a group.
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<p><b>16 and 17</b></p>	<p>Students aged 16 or 17 are permitted to stay in either a homestay or one of our student residences, we have specific residences that cater for under 18s – please see our accommodation section for more details.</p> <p>All staff working in our student residences are required to undergo a criminal record check (called an Enhanced Disclosures and Barring Service check) to ensure their suitability to care for younger students.</p> <p>In residential accommodation students under 18 and over 18 live in different areas; male and female students aged under 18 are also not housed in the same area, to allow staff to better monitor and supervise students and ensure their safety.</p>
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## Private Accommodation

<p><b>ALL under 18</b></p>	<p>Students under 18 are not permitted to live in private accommodation, unless staying with a close relative or with permission from the Centre Manager and parents or guardi-ans</p>
<p><b>Under 16</b></p>	<p>During the day at centre, your child will be supervised during lessons and all centre activities and events. Your child must attend centre every day while lessons are in progress; they are permitted to leave for lunch but must sign in and out of centre at all other times, so a member of staff is aware of their whereabouts.</p> <p>Your child will not be supervised while travelling between the centre and their accommodation. Your child will not be supervised during their free time (e.g. after finishing lessons and returning to their accommodation for dinner). Your child may be unsupervised, at times, during the day at weekends.</p> <p>If your child does not attend centre, does not arrive home for dinner in the evening or is absent without contacting the centre or their host carer, all necessary steps will be taken to locate them (including Police where necessary). Your child will be supervised overnight by their host carer or another appointed and vetted adult.</p> <p>For students under the age of 16 wishing to travel outside the local area (of their centre and accommodation), the centre requires parental permission (provided by the guardian or parent and sent directly to the centre).</p>
<p><b>16 and 17</b></p>	<p>Students aged 16 and 17 years old are expected to be able to live and travel independently while studying with Oxford Spires (see section on consent below). Therefore, students of this age are permitted more freedom. They will not be supervised outside of lesson times, during their free time or at weekends.</p> <p>Student of this age are permitted to travel outside the local area (of their centre and accommodation); however, they should inform the centre and their host carer or residence warden before doing this and must seek permission from the centre and their parent or guardian if they wish to stay away overnight or travel outside the UK.</p>

The centre social programme is not compulsory for any students (except for some Oxford Spires Summer courses – please see Oxford Spires Summer website for details). Activities are supervised by trained members of staff in adequate ratios to ensure sufficient supervision for the number and ages of students attending.

However, students are sometimes required to arrange their own travel between their accommodation and the location of the social event, therefore it is recommended that students under 18 travel to and from social events and activities with friends or in a taxi, especially in the evenings.

Students under 18 years old are not permitted to drink alcohol or attend bars, pubs or nightclubs (this is the Law in England).

## Curfew

<b>Under 16</b>	Students under 16 years old MUST be home by 21.30 every evening unless they are attending an Oxford Spires run activity in which case they must be home at 22.30
<b>16 and 17</b>	Students aged 16 or 17 MUST be home by 22.30 every evening unless they are attending a Oxford Spires run activity in which case they must be home at 23.30

## Overnight stays

<b>ALL under 18</b>	Students are not permitted to stay overnight in another student’s accommodation or at unknown accommodation and are not permitted to receive overnight guests at their own accommodation (unless permission is sought, and the centre satisfied that it is an appropriate and safe arrangement).
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## Medicines and Medical Care

<b>ALL under 18</b>	<p>Parents MUST inform the centre of any medical conditions or medications their child is taking. All students under 18 years old meet with the centre Welfare Officer very soon after starting their course, who will help them with any medical requirements and help them to register with a local doctor.</p> <p>Students bringing medication with them from their own country MUST make sure it is labelled in English (including name of medication and details of dosage).</p> <p><b>Please note: where the centre are required to assist a student with the taking of medication a Parental Agreement form will be required, along with agreement from the Centre Manager that staff are able to be adequately trained to do so effectively and safely.</b></p>
<b>Under 16</b>	Students under 16 will be assisted with the taking of medication where necessary, including safe storage of the medication if needed.
<b>16 and 17</b>	Students aged 16 or 17 years old are expected to be mature and responsible enough to carry and administer their own medication, however if assistance is needed with this, please inform us.

## Airport Transfers

<b>ALL under 18</b>	It is Oxford Spires policy that students under 18 book a return airport taxi transfer through the centre, unless they are travelling with a named adult family member, guardian or close family friend.
<b>Under 16</b>	Students under 16 are required to have an adult present to greet them on arrival and again to accompany them to the check-in desk on departure; Oxford Spires will arrange for this service unless the student is travelling with a named adult family member, guardian or close family friend.
<b>16 and 17</b>	If a student aged 16/17 has a Letter of Consent to Travel, signed by their parent(s), a taxi transfer is not required.

## Parental Consent:

By making a booking with Oxford Spires it is expected that you agree to our terms and conditions and the level of care specified above.

<b>Under 16</b>	For students under 16 a higher level of care and supervision is offered, and a UK based Guardian required along with the additional measures specified above.
<b>16 and 17</b>	For students aged 16 and 17 parents are asked to sign giving permission for their child to live and travel independently whilst studying at Oxford Spires – this means they are not required to have in place a UK based guardian and are permitted more independence than our under 16s (as detailed above). If parents do not wish to sign this, then arrangements for a UK based guardian must be made.

Parental permission is given, as part of Oxford Spires Terms and Conditions, for students to attend activities, centre trips and educational visits, receive emergency medical care and over the counter medication and for a Private Fostering arrangement to be put in place, where necessary.

**Please Note:** Students who do not follow the above guidelines and centre rules will be subject to the Oxford Spires Behaviour and Discipline Policy.

## Appendix G: Safeguarding or Child Protection Concerns; Basic Procedure for DSL/DDSL

This guidance gives a basic outline and quick reference to be followed in the event of the following:

- Child Protection concerns, disclosures or allegations – sexual, physical or emotional abuse; neglect; FGM (Female Genital Mutilation); CSE (Child Sexual Exploitation)
- Students involved in extremism, radicalised behaviour, radicalised groups or societies
- Online grooming or high-risk online activity (viewing and downloading of inappropriate content etc)
- Attempted or suspected risk of suicide or self-harm
- Students going missing from centre or accommodation
- High risk students – i.e. accused of a criminal activity that may pose a risk to other students
- Allegations made against staff or hosts

It is important that any safeguarding or child protection concerns are taken seriously and followed up promptly, following the below steps. The Local Authority Designated Officer should always be contacted as early as possible, along with any other external agencies relevant, unless the centre can be absolutely positive that the concern is unfounded.

This guidance should be read in conjunction with the Oxford Spires Safeguarding and Child Protection Policy, Oxford Spires Dealing with Allegations of Abuse Against Centre Personnel Policy and Oxford Spires Critical Incident Management Policy. **Keeping Children Safe in Education (DfE) gives further detailed information on procedures and legal obligations to be followed in any child protection case and should ALWAYS be consulted, as should Working Together to Safeguard Children (DfE).**

	<b>ACTION</b>	<b>RESPONSIBILITY</b>	<b>TIMEFRAME</b>
1	Concern observed, raised or disclosure made by student, member of staff, host carer etc (See Safeguarding and Child Protection Policy 'Dealing with A Disclosure')	Anyone with a concern	<b>Immediately</b>
2	Complete section A of form 'Disclosure / Incident / Child Protection Concerns Notification Form' (if child is at immediate risk this can be done after DSL/DDSL/ Police informed)	Staff member who receives disclosure/ wishes to raise a concern	<b>Immediately</b> after incident occurs, disclosure is made, or concerns are raised
3	Inform Designated Safeguarding Lead or Deputy Designated Safeguarding Lead of concerns and submit section A of form 'Disclosure / Incident / Child Protection Concerns Notification Form'	Staff member who receives disclosure/ wishes to raise a concern	

**PLEASE NOTE:** stages 2 & 3 should be followed as soon as possible once a concern is identified

**IF A STUDENT IS IN IMMEDIATE DANGER OUT OF CENTRE HOURS OR IN A SITUATION WHERE THERE IS NOT ENOUGH TIME TO INVOLVE THE DSL OR DDSL THE POLICE SHOULD BE CONTACTED IMMEDIATELY**

If a staff member feels they are unable to raise the concern with the DSL/DDSL/Centre Manager or Nominated Director, they should raise the concern directly with the LADO

4	DSL or DDSL meets with Centre Manager to inform of concern and plan next course of action. If Centre Manager not available and consultation required, contact Nominated Director (Matt Simmonite).	DSL DDSL Centre Manager	<b>Immediately</b> after being informed of concern (day or night)
5	Remove child/children from any immediate risk	DSL DDSL Centre Manager	
6	Contact Police if child is at immediate risk	DSL DDSL Centre Manager	
7	Inform key centre staff or host if any immediate measures need to be taken to remove risk or prevent further risk	DSL DDSL Centre Manager	
8	Contact LADO and any other external agencies as necessary – Police, UKVI, healthcare  The LADO should always be contacted even if the Police/UKVI etc have also been informed or involved	DSL DDSL	<b>Immediately</b> after being informed of concern or as soon as possible thereafter

**PLEASE NOTE:** for concerns relating to FGM the Police should be informed immediately.

9	On advice of LADO and Police (if contacted) and in liaison with DSL, DDSL, Centre Manager and any key centre staff devise an Action Plan for supporting the student and further action required	DSL DDSL Centre Manager Key centre staff	
10	Inform Nominated Director (Matt Simmonite) and Director of Operations (Paul Girling) of situation and discuss plan for contacting agents, parents and guardians	DSL DDSL Centre Manager	
11	Inform key centre staff and host of any information pertinent to their care of the child	DSL DDSL Centre Manager	
12	Keep child informed of what is happening	DSL DDSL	

**PLEASE NOTE:** Sections 1 – 12 should all be followed within 24 hours of the incident, concern being raised or disclosure being made

13	Complete section B of form ' <b>Disclosure / Incident / Child Protection Concerns Notification Form</b> ' and begin to fill out chronology (this should be up-dated as and when the situation develops)	DSL DDSL	<b>As soon as possible</b> after steps 1-12 being followed
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14	Contact any agencies who were not contacted as a matter of urgency when the concern was first reported such as: UKVI, Private Fostering Team, GP or healthcare services, counselling services etc	DSL DDSL (UKVI may be contacted by Registrar)	Within <b>48 hours</b> of step 1
15	Contact DBS to inform them of anyone who should be considered for addition to the Barred List.  (Please note: There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child)	DSL DDSL	
16	Confirm and add to the <b>Action Plan</b> what happens next and steps to support the student, ensuring staff are aware of their responsibilities and confirming timeframes	DSL DDSL Centre Manager	
17	Continue to liaise with external agencies and follow up if information is not shared promptly.  (Please note: The Local Authority should make a decision within 1 working day of a referral being made about what course of action they are taking and should let the referrer know the outcome)	DSL DDSL	Within <b>72 hours</b> of step 1
18	Continue to add to the Chronology as the situation develops and is dealt with.	DSL DDSL	
19	Ensure all records are kept up to date, including adding details to Child Protection Register, collecting and keeping all emails and key documents to add to CP case file (keep case file in a lockable drawer or filing cabinet).  PLEASE NOTE: records may be required at child protection case conference or core group meetings so they must be as detailed and comprehensive as possible.	DSL DDSL	
20	Set a date to review how the incident/concern was handled by the centre and whether any actions should be taken to improve processes or prevent further issues from occurring in future.  Add any action points to relevant risk assessments or create an action plan for improvement	DSL DDSL Centre Manager Safeguarding Committee	
21	Continue to liaise with relevant agencies and continue with the <b>Action Plan</b> until case is either closed, no longer requires involvement by centre or continue to review and adapt <b>Action Plan</b> as necessary for ongoing cases	DSL DDSL Centre Manager Safeguarding Committee	



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