



# Safeguarding Under-18s and Vulnerable Adults Policy

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Oxford ILS

*Policies and procedures for the safeguarding of students*

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<b>Policy:</b>	<b>Safeguarding Under-18s and Vulnerable Adults Policy</b>
<b>Objective:</b>	<ul style="list-style-type: none"> <li>• To promote safety and welfare of all students, especially under 18s and vulnerable adults.</li> <li>• To ensure every adult within the School is aware of their responsibilities.</li> <li>• To make informed and confident responses to specific child and vulnerable adult issues.</li> <li>• To protect pupils from abuse and to protect staff and volunteers from suspicion of abuse.</li> </ul>
<b>Relevant to:</b>	All members of staff (including all permanent, contracted, agency and volunteer staff), students, parents and agents, homestay providers, third party contractors and anyone else who comes into Oxford ILS premises.
<b>Date introduced:</b>	August 2014
<b>Date modified/reviewed:</b>	January 2020
<b>Reviewed by:</b>	Ewa Bialek
<b>Publication:</b>	This policy is available to staff, students, parents and external parties via <a href="http://www.oxford-school.co.uk">www.oxford-school.co.uk</a>
<b>Next review date:</b>	January 2021

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## 1. Safeguarding Statement

### SAFEGUARDING STATEMENT

Oxford ILS is committed to providing a safe and healthy learning environment to all students and staff, particularly to students under the age of 18 and vulnerable adults. The School expects all staff to share this commitment.

The learner experience and individual wellbeing are paramount and safeguarding initiatives and policies have been implemented to reflect this.

The School provides a safe physical environment for its learners, staff and visitors, ensuring that premises are of a good standard and Health & Safety arrangements are in place.

The School ensures safeguarding legislation and guidance are adhered to and taken into account when developing and revising policies, procedures and associated arrangements.

The School has a Designated Safeguarding Lead responsible for child protection, supporting staff in carrying out their safeguarding duties together with recording and monitoring processes.

It is a condition of employment that all staff are trained to a level appropriate to their safeguarding responsibilities.

## 2. Policy Overview

### 2.1 Context

Oxford ILS has a responsibility to provide a safe and healthy learning environment for all our students regardless the gender, background, nationality or religion, especially for students under the age of 18 and vulnerable adults (VAs). The school meets its child protection and VAs responsibilities through safer recruitment, regular staff training, a clear Code of Conduct, safeguarding policies and appropriate communication.

The contact details of Oxford ILS are as follows:

Address:	Oxford International Language School The Old Music Hall 106-108 Cowley Road Oxford, OX4 1JE United Kingdom
Telephone number:	+44 (0) 1865 403351
24 hours Emergency number (out of office hours):	+44 (0) 7956 140847
Email:	info@oxford-school.co.uk
Website:	<a href="http://www.oxford-school.co.uk">www.oxford-school.co.uk</a>

Students under the age of 16 are not to be placed in classes with students aged 18 or older. Students aged 16 and 17 may attend adult classes, on condition that a "16+ Consent to Travel and Study Form" is completed and signed by the parent/guardian.

## 2.2 Availability and Formats

This document is available via the following:

- Full version on the Oxford ILS website.
- Full version in the Oxford ILS office.
- Condensed version included in the Homestay Handbook and given to all Homestay Providers.
- Condensed version “Safeguarding Information for Parents” available on the Oxford ILS website.
- Condensed version “Guidelines and rules for students under 18” given to each student under the age of 18 in the Welcome Pack.
- Available to any person upon request.

## 2.3 Associated Policies and Documents

Attendance and Absence Policy  
 Prevent Policy  
 Fire Safety  
 Registration Form  
 Pre-arrival  
 Terms and Conditions for JSS  
 Terms and Conditions for Adult Courses  
 Student Handbook  
 Guidelines and Rules for Students Under 18  
 16+ Consent to Travel and Study Form  
 Junior Consent to Travel and Study Form  
 Staff Code of Conduct  
 HR – Safer Recruitment  
 Homestay Handbook  
 Self-disclosure Form  
 Stay Safe Guidelines  
 Excursion and Activity Form  
 Risk Assessments – (Fire, Journey, Airport, Activities)  
 Missing Student Action Plan  
 Fire Emergency Action Plan  
 Disclosure / Incident / Child Protection Concerns Notification Form – Appendix 4  
 Dealing with allegations of abuse against members of staff and volunteers.

## 2.4 Terminology

<b>Oxford International Language School (Oxford ILS)</b>	Also referred to as “Oxford ILS” or “the School”.
<b>Adult</b>	Person 18 years old or over.
<b>Child</b>	Person under the age of 18. Also referred to as “U18”.
<b>Vulnerable Adult (VA)</b>	A person aged 18 years or over with learning disabilities or physical difficulties. Also referred to as “VA” .
<b>Junior Student (JS)</b>	All students between the age 13 and 17 attending Oxford ILS Junior Summer School Programme or within a closed group. Students on this programme are supervised and must follow the Terms and Conditions of the Junior School Programme. Also referred to as “JS”.
<b>Student aged 16 and 17 attending adult classes (16+)</b>	A student aged 16 and 17, whose parents have signed the “16 + Consent to Travel and Study Form”, can attend adult courses and are treated as adults in accordance to UK legislation. Also referred to as “16+”.
<b>Homestay Provider (HP)</b>	A person/persons that forms a family unit and who hosts students. Also referred to as “HP”

<b>Child Abuse</b>	An action by another person - adult or child - that causes significant harm to a child. It can be physical, emotional or sexual.
<b>Child Protection</b>	Protecting children from direct harmful behaviour.
<b>Duty of Care</b>	Everyone working with children has a 'Duty of Care' to keep children and VAs safe and protect them from harm. This means that all adults have a duty to look after their safety and wellbeing.
<b>Safeguarding</b>	Protecting children from maltreatment and ensuring that children are attending the School in circumstances consistent with the provision of safe and effective care. Preventing impairment of children's health or development.
<b>Welfare</b>	Well-being of a person - physical and mental.
<b>Designated Safeguarding Lead (DSL)</b>	A person responsible for the safeguarding and welfare of students, supported by other members of the School. Also referred to as "DSL".
<b>Designated Safeguarding Person (DSP)</b>	A person responsible for supporting the DSL in their duties and day-to-day responsibilities, and for assuming these duties and responsibilities in DSL's absence. Also referred to as "DSP".

### 3. Welfare Provision

#### 3.1 U18 and VA Principles

Oxford ILS premises are located in a building where other companies also occupy space. Children may come in contact with other adults in the building. It is the School policy to instruct the children on their first day of the School, not to approach or talk to anyone other than Oxford ILS staff.

Oxford ILS will ensure that suitable arrangements are made for safety and welfare between and outside scheduled lessons and activities.

During the summer months, the School hires additional premises to run the Junior Summer School Programme. The premises are located in a separate building hired for Oxford ILS Junior Summer School purpose only.

#### **For the safety and welfare of students U18 and VAs, Oxford ILS will:**

- Provide students, their parents/guardians and group leaders with information about the course, bus transfers, accommodation, activities, contact details and emergency number for the School.
- Ensure that all students U18 and VAs on a JS programme sign in and sign out on any arrival and departure to/from Oxford ILS premises.
- Provide U18s with identification cards.
- Provide an Orientation Tour (JS only).
- Provide a Welcome Pack.
- Provide an Induction Briefing: living in Oxford, Health & Safety, and Rules and Regulations on what students may do outside scheduled lessons, without supervision, informs them on how to stay safe and the curfew times.
- Ensure that all members of Oxford ILS staff wear a visible identification card.
- Ensure that all U18s and VAs are aware of the safeguarding and welfare representatives, and know who to turn to if they need advice or support.
- Ensure that all staff share the responsibility to protect U18s and VAs from harm, which includes identifying possible protection issues and follow the Safeguarding Policy.
- Ensure that the School building, and the additional premises, provide a safe and secure environment for all students.
- Ensure that HPs provide a safe and secure environment for all students.
- Ensure that the HPs adhere to Oxford ILS Safeguarding policy.
- Ensure that all Oxford ILS staff are aware of students who are under 18 and VAs which may require special needs and attention.
- Ensure that in the event that an U18 or VA student is missing or their whereabouts are not known to Oxford ILS staff or the HP, procedures are invoked to locate the student immediately.



- Arrange airport transfers, where required.
- Implement procedures in line with relevant legislation in case of incidents, concerns or reports.

### 3.2 Staff Responsibilities

#### Group Leader, JS Programme Coordinator, Activities Supervisor, DSL, DSP, Welfare Officer, Accommodation Manager, Homestay Providers, Agents

<b>Group Leader (GL)</b>	Responsible for groups visiting Oxford ILS on one of our programmes. Oxford ILS has a group ratio of <b>1:12</b> staff per student. For example, a group of 24 students is under supervision of one GL and a staff member of Oxford ILS, usually the JS Programme Coordinator (PC) or Activities Supervisor (AS).
<b>JS Programme Coordinator (PC)</b>	<ul style="list-style-type: none"> <li>▪ Responsible for the overall running of the Junior School and for supervising and support of GLs.</li> <li>▪ Ensures that the safeguarding procedures are followed.</li> <li>▪ Carries out a risk assessments in relation to each off-site activity. Takes appropriate post-evaluation action, where necessary.</li> <li>▪ Responsible for preparing and reviewing the “Excursion and Activity form” of the upcoming activities and excursions. Obtains approval from the Director.</li> <li>▪ Handles concerns and reports and, in case of a missing student, takes appropriate action.</li> </ul>
<b>Activities Supervisor (AS)</b>	<ul style="list-style-type: none"> <li>▪ Ensures that the safeguarding procedures are followed.</li> <li>▪ Supports the PC and carries out risk assessments where necessary.</li> <li>▪ Follows and adheres to the risk assessments, updates and evaluates the “Excursion and Activity Form” after each activity and excursion.</li> <li>▪ Handles concerns and reports and, in case of a missing student, takes appropriate action.</li> </ul>
<b>DSL</b>	Responsible for the safeguarding and welfare of all students at Oxford ILS and is supported by other members of the Oxford ILS staff. The DSL ensures that: <ul style="list-style-type: none"> <li>▪ All members of staff understand and act in accordance to the School’s “Safeguarding of under-18s and Vulnerable Adults Policy”.</li> <li>▪ Support to all staff regarding child protection is provided.</li> <li>▪ Safer Recruitment procedures are followed, as per Section 4 of this policy.</li> <li>▪ All staff are up-to-date with safeguarding training.</li> <li>▪ All U18 and VA students receive a full induction and that they have sufficient and appropriate means to report concerns, issues and incidents.</li> <li>▪ Children at risk are reported to LCSS or MASH and that a complete up-to-date record of all child protection-related concerns, incidents, reports, referrals and complaints is maintained.</li> <li>▪ This policy is reviewed and updated annually or if needed.</li> <li>▪ This policy is available to students and their parents or guardians.</li> </ul>
<b>DSP</b>	Supports the DSL and takes over the duties and responsibilities in the absence of the DSL.
<b>Welfare Officer</b>	<ul style="list-style-type: none"> <li>▪ Provides support and information on welfare matters and handles any queries, needs or concerns relating to welfare of the students.</li> <li>▪ Works closely with the JS Programme Coordinator and the DSL.</li> </ul>
<b>Accommodation Manager</b>	Responsible for overall liability of the Homestay Providers, mainly: <ul style="list-style-type: none"> <li>▪ Ensures that students under the age of 18 are accommodated with a DBS checked Homestay Providers.</li> <li>▪ Ensures all Homestay Providers working with Oxford ILS read, understand, sign and adhere to the “Homestay Handbook” and “Homestay Host Contract”.</li> </ul>
<b>Homestay Provider (HP)</b>	<ul style="list-style-type: none"> <li>▪ Responsible for the welfare of the students they are hosting.</li> <li>▪ Follow the “Homestay Handbook” to ensure that the curfew and the Safeguarding policy are respected.</li> <li>▪ Where a student is late or missing the HP must inform the school immediately.</li> </ul>
<b>Agents</b>	Follow the School’s Terms and Conditions and Agent Contract Agreement.



### 3.3 Airport Arrivals, Departures and Transport

#### International Students under-18 Travelling to the UK

All students aged 13-15 travelling without an adult must be met at the airport, whether by an Oxford ILS representative or a local guardian. Oxford ILS can arrange for a taxi pick-up and drop-off from a UK airport. Parents/Guardians will be required to provide detailed travel information for the arrival of their child. These must be sent and reviewed by Oxford ILS no later than ten working days before the child arrives. Last-minute arrangements are not acceptable, as messages could go astray and children could arrive without anyone to meet them.

#### Arrivals and departures

All students must arrive on Sunday prior to the course start date. Arrivals to Homestay Providers should be between 14:00 and 20:00. Departure time is no later than 12.00 on the last day at the Homestay Provider.

#### Pick-up and drop-off in Oxford

If the student is arranging their own transportation to or from the airport Oxford ILS has to be informed.

Oxford ILS can arrange for a taxi pick-up and drop-off from a UK airport. For group bookings, the School can book a coach to and from the airport, and for students to be picked-up and dropped-off between an Oxford meeting point and their Homestay Provider. On very rare occasions, this service may not be available, in which case the School will notify the Group Leader at least 24 hours before the group arrival time, and the School will arrange for transport to the Homestay Provider.

*Note: All students must bring with them the following original documents and show them to the School on their first day: valid passport or ID, Signed Consent to Travel and Study form (JSS/16+), visa approval letter.*

### 3.4 Homestay Accommodation

Homestay Accommodation is provided by local families who are checked and approved by Oxford ILS before taking U18 and VAs. All HPs must provide the School with the following:

#### HP Registration documents required:

- Proof of identification - valid passport
- Proof of address - bank statement, council tax bill or utility bill
- Certificate for completed Prevent training
- Current Gas Safety Certificate
- Bank account details for payment
- Self-Disclosure Form
- Fire safety risk assessment

#### Additionally, if hosting students under the age of 18 and Vulnerable Adults, the HPs must provide:

- Details of two referees
- a Consent to undergo an enhanced DBS check
- a Safeguarding training certificate

#### Curfew times for students under the age of 18 years.

Each student must follow the curfew times, which are:

- **Students on Junior School Programmes aged between 13-17 are not allowed to go out after dinner (7.30pm) without their Homestay Provider's supervision, except when traveling to an evening activity organised by Oxford ILS.**
- **Students aged 16 and 17 enrolled on adult classes must be home by 10.30pm.**

### 3.5 Risk Assessments

Risk assessments are carried out for: Airport transfers, the School building and any temporary premises used, students' journeys to and from school, excursions and activities, and surrounding areas of the School's premises.

The PC and AS, who are responsible for the activities must:

- Complete an "Excursion and Activity Form", with relevant information, before the activity/excursion takes place and obtain approval from a Director.
- Give students a briefing on the activity or excursion with appropriate safety information.
- Provide a post-evaluation of the activity with areas for improvement, where necessary.

### 3.6 Behaviour and Discipline

All students are encouraged to behave in a positive way, and are given Student Rules and Regulations. The School reserves the right to dismiss a student from the Programme who violates the Student Rules and Regulations or misbehaves.

### 3.7 Missing Student Action Plan

If Oxford ILS staff or the HP cannot account on the whereabouts of a student, Missing Student procedures are invoked immediately:

- 1) Staff or HP provider will attempt to contact the student or any known local friends, guardians or other Oxford ILS staff members.
- 2) Fellow students will be questioned about the missing student's whereabouts.
- 3) School premises, school surroundings, Homestay accommodation will be searched.
- 4) If the student cannot be found the Director and the Police (999) will be contacted.

### 3.8 Fire Safety

All students are walked through the Oxford ILS premises/JSS premises on their first day during Induction. Fire escapes and routes are clearly visible and students are informed of the fire escape process and shown where the assembly point is.

Oxford ILS will ensure that all HP accommodation is equipped with smoke detectors and obtain a copy of all annual gas safety certificates from the HP.

### 3.9 First Aid and Medical Care

The School is equipped with a First Aid kit and a portable First Aid kit which are located in the Oxford ILS office. There are additional First Aid kits in the communal areas of the building. There is a dedicated First Aid Person in the School available during the day and for most of the evening activities. The additional (JSS) premises are equipped with a First Aid kit and there is a First Aid person available during the day.

If the student requires medical treatment, the School or the HP can help them arrange to see a local GP. If a student falls ill while in the care of the HP, the School must be informed straight away.

No medicine is to be administered to students without parental consent or a doctor's prescription. Please see our Terms and Conditions for Junior Programme, section Liability and Insurance.

## **Arrangements for meeting the medical needs of children with medical conditions:**

Oxford ILS will ensure that the needs of a child with medical conditions will be met as follows:

- All relevant Oxford ILS staff (incl. HPs) will be made aware of the child's condition and requirements.
- Risk assessments will take into consideration the requirements of children with medical conditions.

### **3.10 Use of Force and Restraint (Physical Intervention)**

Oxford ILS staff members may legitimately intervene to prevent a student from committing a criminal offence, injuring themselves or others, or causing damage to property. This intervention will be used only as a last resort and any physical contact will be the minimum required. Under no circumstances will physical force be used as a form of punishment.

## **4. Safer Recruitment**

### **4.1 Selection Process**

All applicants are subject to recruitment and selection procedures, designed to emphasize the School's commitment to safeguarding. The procedures include:

- Completion of an application form, to include declaring any former names.
- Questioning at interview stage, to include questions related to working with children and explanation of any gaps in the candidate's CV.
- Verification of appropriate qualifications.
- Providing proof of identity.
- Acquiring two references (one from the current/most recent employer), which include questions on the candidate's suitability to work with children.
- Conducting a criminal records check (Enhanced DBS).
- Signing a Self-disclosure form.

When recruiting from outside of the UK, it is not possible to request a DBS check, so a police 'Certificate of Good Conduct' or 'Certificate of Criminal Record' is requested instead.

Applicants awaiting the receipt of a DBS certificate may begin work but will not be given unsupervised access to students U18 and VAs until the certificate has been seen by the manager responsible for recruitment.

Students under the age of 18 and VAs will not be placed in homes with HPs awaiting the receipt of a DBS certificate.

### **4.2 Applicants with a Criminal Record**

Applicants with a criminal record will not necessarily be barred from working with the School. This will depend on the nature of the role, and the circumstances and background of the offences

## 5. Code of Conduct

### 5.1 Electronic contact with students U18, VAs and E-safety

Electronic contact is defined as the communication or publication of information (including images) between two or more people using an electronic device. This may occur using (but is not limited to) voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos.

This policy applies to the relationship between students U18, VAs and staff before, during or after a course.

Staff must request permission from the DSL or DSP, for any electronic contact with a child or VA which is of a non-work-related nature before, during or after a course. Requesting mobile phone numbers from students is necessary for school's social activities, however, staff should only give out the school social activities mobile number, and not their own private number. Social-networking on Facebook, Instagram etc. is strictly prohibited.

In any electronic contact with students, staff must pay particular attention to use neutral, un-emotive language that will not be misconstrued. Staff must not exchange any information with a child and VA that they would not be happy to share with the child's parent or carer.

The School recognises that E-safety is an area of growing concern. Whilst Oxford ILS cannot exert full control over how children and VAs choose to conduct themselves online and using electronic device, maximum effort is made to guide them in making good choices.

### 5.2 Alcohol, Drugs and Smoking

All students are informed about the law regarding alcohol, drugs and tobacco during their induction on day one.

The legal age to be able to purchase tobacco in the UK is 18. If a student known to be under the age of 18 is seen smoking they should be asked to stop.

Students are not permitted to bring alcohol onto the School premises. If a social activity is for students aged over 18 only, the School will ensure that younger students do not attend. If you suspect a student is under the age of 18, please report this to the DSL.

Drugs or illegal substances must not be solicited, sold, used or brought onto Oxford ILS premises at any time. Oxford ILS reserves the right to remove a student from the School and/or HP if the student's behaviour is deemed to be unacceptable regarding the use of alcohol, drugs or illegal substances. No refund will be given and Oxford ILS will not be responsible for any additional costs incurred by the student.

### 5.3 Personal Information and Photographs

Oxford ILS uses the personal information that a student, parent or guardian gives us, including information about health, religious, or dietary requirements, to perform our contract with the student, parent or guardian.

All students are requested to complete a Data Consent Form, where they give the School consent to take and use photos, videos, comments and results. For more information please see our [Privacy Policy](#).

## 5.4 Whistleblowing

All Staff at Oxford ILS are required to report to the DSL or DSP any instances where they suspect a fellow member of staff to be engaging, or to have engaged, in any inappropriate or illegal activity. Confidentiality and support will be given to any staff member who raises such concerns.

## 5.5 Anti-bullying

Oxford ILS has a zero-tolerance on any kind of bullying. Physical, verbal, indirect or cyberbullying will not be tolerated and incidents of bullying will be dealt seriously. All staff is encouraged to look out for signs of bullying and report any concerns or issues to the DSL or any leading staff member. Please refer to *Appendix 1 and Oxford ILS Anti Bullying Policy*.

## 5.6 Equal Opportunity/Discrimination/Harassment

Oxford ILS is committed to ensuring that all staff and students enjoy an environment free from discrimination, harassment and victimisation. Our commitment is to create a working environment in which there is mutual trust and respect, and where everyone is treated fairly. Disciplinary action will be taken against individuals who breach the policy.

## 5.7 Radicalisation and Extremism

The School is a multicultural and international community in which we help to foster an acceptance and tolerance of a range of views students may encounter in such an environment. We encourage our students to express their views and beliefs as long as these respect the core British values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those of different faiths and beliefs.

At Oxford ILS, we are aware that some students may have been exposed to extremist influences or prejudiced views before their arrival in the UK, or may be exposed to them after coming here. These influences may emanate from a variety of sources and media, including via the internet. At times students may themselves reflect or display views that may be discriminatory, prejudiced or extremist, including derogatory language. Displayed by students or staff this will always be challenged and dealt with in line with the relevant policies on student behaviour and staff conduct.

As part of wider safeguarding responsibilities, staff will be alert to and have a duty to report:

- Disclosure by students of their exposure to the extremist actions, views or materials of others outside of the school, such as in their homes or community groups.
- Graffiti symbols, writing or artwork promoting extremist messages or images.
- Students accessing extremist material online, including through social networking sites.
- Changes in behaviour, friendships or actions.
- Students voicing opinions drawn from extremist ideologies or narratives.
- Use of extremist or “hate” terms to exclude others or incite violence.
- Intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on, but not exclusive to, gender, disability, sexuality, race, colour or culture.
- Attempts to impose extremist views or practices on others.
- Anti-Western or Anti-British views.

In the first instance, reports of any of the above will be made to the DSL or DPS. In extreme cases the police may need to be notified.

## 6. Child Protection

### 6.1 Recognising Symptoms of Abuse

While abuse of young people at Oxford ILS is unlikely, we should not assume that it could never happen. Our duty of care to young people and VAs extends to watching out for signs of potential abuse. There are four forms of abuse, that is: sexual abuse, emotional abuse, physical abuse and neglect. For signs to look out for, please see *Appendix 2*.

### 6.2 Specific Areas of Abuse

- Bullying and cyberbullying
- Drug or alcohol use
- Racial, Sexual, Gender, Ethnic discrimination
- Domestic violence
- Faith abuse
- Forced marriage
- Gang and youth violence
- Mental health
- Private fostering
- Radicalisation
- Extremism
- Sexting
- Teenage relationship abuse
- Trafficking

In addition to the types of abuse mentioned above, two other specific types of abuse to that staff must be aware of are Child Sexual Exploitation (CSE) and Female Genital Mutilation (FGM). Please see *Appendix 3* for more information.

As part of ongoing training, staff are made aware that the above issues exist and may arise although it is unlikely in our context. Oxford ILS acknowledges our duty to act appropriately in response to any allegations, reports or suspicions of abuse.

### 6.3 Receiving a Report of Concern

If an U18 or VA discloses suspected abuse to a member of staff, it is NOT for that member of staff to decide whether or not a suspicion or allegation is true. The concerns of an U18 or VA should be taken seriously, recorded and passed on to the DSL, following this procedure:

#### 1. Receive

- try to meet the child in a semi-public or visible space if possible
- listen calmly, allow the child to speak without interruption
- do not overreact by what you hear or appear shocked
- accept what is said and take what the child says seriously
- do not interrogate or ask leading questions

#### 2. Reassure

- alleviate feelings of guilt and isolation, while passing no judgment
- explain that you will try to offer support, but that you must pass the information on
- be honest, do not make promises you cannot keep

#### 3. React

- never guarantee absolute confidentiality, as Child Protection will always have precedence over any other issue

- explain what you have to do and who you have to tell
4. Record
- record the discussion accurately, as soon as possible after the event
  - use the child's words or explanations, rather than your interpretations or assumptions
  - include statements and observable things
  - keep your original notes in case they are later required in court
5. Act
- inform the DSL or a DSP immediately
  - in case they are unavailable, inform the Welfare Officer or Director

#### 6.4 Referring a Report

All Oxford ILS staff are aware that any concerns or allegations have to be reported immediately to the DSL or to the leading management staff. For any safeguarding concerns on open cases and a "no names" consultation, in case it would be inappropriate to report a concern to the DSL, you can contact:

**For non-immediate safeguarding concerns - The Locality and Community Support Service:**

LCSS Central  
 lcss.central@oxfordshire.gov.uk  
 0345 241270

**For any immediate concerns about a child – Multi-Agency Safeguarding Hub (MASH):**

mash-childrens@oxfordshire.gcsx.gov.uk  
 0340507666

**The Police:**

999 in an emergency

#### 6.5 Keeping Records

All records are confidential and are kept in a secure place in a locked room by the DSL. Only nominated staff of Oxford ILS have access to these files and records.

In case an allegation has been made, or someone in Oxford ILS has concerns, a Disclosure/Incident/Child Protection Concerns Notification Form will be completed which is part of this Safeguarding Policy.

- Once a statement has been collected from a child or a VA, further questioning should be avoided apart from important clarification of factual detail.
- A senior management representative and the DSL will meet at the earliest possible opportunity to consider an appropriate course of action in response to the information revealed by the student U18 or VA and consider any other relevant information.
- The Director will decide if it is appropriate to involve other members of the school staff, and also whether to inform the student's agent and parents. There may be no need to take any further action, in which case this decision should be recorded in writing.
- Further action may include the immediate removal of any imminent threat of danger, seeking advice from the Local Authority or contacting the police, depending on the severity of the allegation.



## 6.6 Allegations against Staff Members

A student of Oxford ILS may make an allegation, if a staff member of Oxford ILS has:

- behaved in a way that has harmed a child, or may have hurt a child/VA
- possibly committed a criminal offence against or related to a child/VA
- behaved towards a child/VA in a way that indicates they may pose a risk of harm to children

If such an allegation is made, the member of staff receiving the allegation will immediately inform the DSL or the most senior member staff available.

If the allegation is made against the DSL, the person receiving the allegation will immediately inform the DSP, or Welfare Officer, or a senior management person, who will consult the allegation with the LADO.

All staff should take care not to place themselves in a vulnerable position with a child. Parents of the child involved will be informed about the allegation as soon as possible. While the allegation is being considered, the School will make every effort to maintain confidentiality. Details of allegations that are found to have been malicious will be removed from personnel records.

## 7. Policy Delivery

### 7.1 Roles and Responsibilities

Oxford ILS recognises its responsibility to ensure that all staff is adequately trained in safeguarding according to their degree of contact with U18s and level of responsibility in relation to safeguarding.

The DSL is responsible for overseeing all Safeguarding training and for ensuring that all staff are trained to the necessary level and that training is refreshed every 2 years.

Name	Role	Training completed	Date of completion
Ewa Bialek	School Director, DSL, Prevent Lead	Generalist Safeguarding Lead (level 3)	21.03.2020
Csilla Cernayova	Office and Accommodation Manager, DSP	Generalist Safeguarding Lead (level 3)	10.03.2020

## Appendix 1

**Bullying** is defined as deliberately hurtful behaviour, repeated over a period of time, where a student feels intimidated and unable to defend themselves.

- Physical: hitting, kicking, theft
- Verbal: name-calling, racist remarks
- Indirect: spreading rumours, excluding someone from social groups, giving dirty looks
- Making people feel unhappy on purpose
- Cyber bullying: using text messaging, internet sites, instant messaging

## Appendix 2

Here are some signs to look out for that may indicate a child or VA is suffering from abuse. Some signs may vary with the age of the child or VA. Not every child or VA will exhibit every symptom. As well as signs, children and VAs may tell you of abuse. Always listen and follow the procedures for responding to allegations of abuse.

Signs of abuse can include:

- **Sexual abuse** - acting in an inappropriate sexual way with objects or peers, nightmares or sleeping problems, becoming withdrawn or clingy, personality changes, seeming insecure, unaccountable fear/dread of particular places or people, changes in eating habits, physical signs such as unexplained soreness around genitals, sexually transmitted diseases, becoming secretive.
- **Emotional abuse** - delayed physical or emotional development, shows extremes of passivity or aggression, sudden speech disorders, overreaction to mistakes, or continual self-depreciation, neurotic behaviour (rocking, hair twisting, self-mutilation).
- **Physical abuse** - having unexplained bruises, burns etc., and wearing clothes to cover injuries, even in hot weather.
- **Neglect** - being often hungry, may beg or steal food, badly dressed in clothes that need washing, poor appearance and personal hygiene, unwashed, hair not brushed, lacks needed medical or dental care, often tired, might abuse alcohol or other drugs.

## Appendix 3

1. **Child Sexual Exploitation** - this is a form of sexual abuse where students under 18 are exploited to engage in sexual activity in return for money, gifts, drugs, affection or status. CSE does not always involve physical contact as it can happen online or involve pressure from peers or cyberbullying. Signs to look for in under 18s include:

- having a much older boyfriend/girlfriend
- appearing with unexplained gifts or new possessions
- associating with others involved in exploitation
- misusing drugs or alcohol
- being absent from school, going missing or regularly coming back late to the homestay

2. **Female Genital Mutilation (FGM)** - this is a practice that can cause severe and long-lasting damage to physical and mental health. It is carried out for religious, social or cultural reasons; however there are no medical reasons for carrying it out. It is a criminal offence if done in the UK. Staff should be aware that a person who has suffered FGM may ask for help without being explicit about the problem due to embarrassment or fear. Any causes for concern are to be reported to the DSL.

## Appendix 4

### Disclosure/Incident /Child Protection Concerns Notification Form

<b>Date:</b>	<b>Name and role of the person completing this From:</b>
<b>Name and details of VA or child:</b>	<b>Name and role of the person the child or VA disclosed to/reported:</b>
<b>Please answer the following questions:</b>	
<ol style="list-style-type: none"><li>1. Is the person making the report expressing their own concerns, or passing on those of somebody else?</li><li>2. What has prompted the concerns?</li><li>3. Include dates and times of any specific incidents known. Has the VA, child or young person been spoken to? If so, what was said?</li><li>4. Has any individual been identified in the allegation? Who has this been passed on to, in order that appropriate action is taken?</li><li>5. Who else has been consulted?</li></ol>	

**Action taken by the DSL: Details of disclosure by child/incident/child protection concerns:**

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**Notes of feedback between DSL/DSP and the person who raised this child protection concern, including date of feedback:**

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**Date and name of person(s) to review:**

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**Notes of review:**

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