



**OXFORD
International
College**

A NORD ANGLIA EDUCATION SCHOOL

SAFEGUARDING AND CHILD PROTECTION POLICY

POLICY INTENDED FOR:	Governors, Staff, Volunteers, Contractors or partner Agency Staff
CATEGORY:	Safeguarding
POLICY IMPLEMENTED BY:	Principal
REVIEWED BY:	OIC Safeguarding Governor
CONSULTATION WITH:	Designated Safeguarding Lead, OSCP
REVIEW DATE:	September 2026
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KEY CONTACT DETAILS

Key Personnel	Name(s)	Contact details
Designated Safeguarding Lead (DSL)	Severine Collins	07900 091 649 Severine.collins@oxcoll.com
Deputy DSL(s)	Ben Holman Meryl Suissa Jenny Bourlakis	07379119 941 Ben.holman@oxcoll.com 07444 244 051 Meryl.suissa@oxcoll.com 07557358448 jenny@oxcoll.com
College's named 'Prevent' lead	Ben Holman	Ben.holman@oxcoll.com
Nominated Safeguarding Governor	Sue Hill	07464428455 Sue.hill@nordanglia.com
Chair of Governors	Richard Davies	Richard.davies@nordanglia.com
Education Safeguarding Advisory Team/ Local Authority Designated Officers (LADOs)	Jo Lloyd Sandra Barratt Amie Pilcher	01865 810603 Lado.safeguardingchildren@oxfordshire.gov.uk
Education Safeguarding Advisory Team (ESAT)	ESAT team	01865 810603 ESAT.safeguardingchildren@oxfordshire.gov.uk
Locality Community Support Service (LCSS) worker	Kim Costar	07880 042 655 Kim.Costar@Oxfordshire.gov.uk
Multi agency Safeguarding Hub (MASH)		0345 050 7666
Out of hours Emergency Duty Team (EDT)		0800 833408
Police		101 or in emergencies 999

PART ONE - OUR SAFEGUARDING APPROACH

1. Introduction

Safeguarding is woven into everyday life at Oxford International College. It shapes the way we teach, lead, care for and support our students, influencing every decision we make and underpinning our commitment to providing an environment where every student feels safe, valued and able to thrive.

Oxford International College (OIC) is an international boarding college educating students aged 14 to 20. For most students, the College is both their place of education and their home for much of the year. This creates unique opportunities to know our students well while placing a particular responsibility on every member of the college community to safeguard their welfare.

Safeguarding is everyone's responsibility. Every adult working at, or on behalf of, the College contributes to recognising concerns, responding appropriately and promoting students' wellbeing. Safeguarding depends upon the vigilance, commitment and actions of governors, staff, volunteers, contractors and visitors.

Our approach extends beyond protecting students from abuse, exploitation and neglect. It is about creating a culture in which students feel confident to speak, know they will be listened to, receive timely support and develop the knowledge, confidence and resilience to keep themselves safe throughout their lives.

Most of our students are living away from home, in a different country, often for the first time. They may experience cultural, linguistic or emotional barriers to seeking help or be unfamiliar with UK safeguarding expectations. Therefore, building trusted relationships, fostering a strong sense of belonging and ensuring every student knows where to seek help are central to our safeguarding approach.

We know that safeguarding risks continue to evolve. We remain alert to emerging risks including contextual safeguarding concerns, online abuse, technology-enabled harm including consensual and non-consensual making or sharing of nudes or semi-nudes, exploitation, harmful sexual behaviour, serious violence, radicalisation, drug taking and/or alcohol misuse, attendance-related vulnerability, mental health concerns, and the opportunities and risks presented by rapidly developing technologies, including generative artificial intelligence¹.

This policy explains how safeguarding is led and delivered across Oxford International College. It reflects our values, fulfils our statutory responsibilities and provides the framework through which every member of the college community contributes to keeping students safe. It is not meant to replace DfE and statutory guidance and **must always be read, understood and used alongside Keeping Children Safe in Education**.

2. Our Commitment to Safeguarding

We believe safeguarding is most effective when students feel known, valued and listened to. Every interaction is an opportunity to build trust, identify emerging concerns and promote wellbeing.

Our approach is guided by seven commitments.

- **We put students first.**

Students' welfare is at the centre of every safeguarding decision, and the safeguarding team considers at all times what is in the best interest of the student. We listen carefully, seek to understand each student's experiences and circumstances, and consider their wishes and feelings alongside professional judgement,

¹ Additional information on these safeguarding issues and information on other safeguarding issues is included in sections 9, 10 and 11, and Appendix C of this policy, as well as in Part One of Keeping Children Safe in Education 2026

safeguarding evidence and statutory guidance.

- **We act early.**

Safeguarding begins long before significant harm occurs. When protecting students from maltreatment, whether that is within or outside college, the home, or online, staff must share concerns as soon as they arise, recognising that even minor events may reveal increasing vulnerability when considered alongside other information. Early identification, timely intervention and coordinated support improve outcomes for students.

- **We work together.**

Students live and learn within the college community, so safeguarding extends across every aspect of college life. **No single practitioner can have a full picture of a child's needs and circumstances.** Academic staff, boarding staff, nurses, counsellors, support staff, contractors and the SLT work closely together to build a complete understanding of each student's needs and circumstance, and to provide coordinated support whenever concerns arise.

- **We promote inclusive and anti-discriminatory safeguarding.**

We recognise that discrimination, prejudice, racism, faith-based prejudice, bias and other forms of marginalisation can affect how students experience harm, how concerns are identified and how readily students seek help. Safeguarding practice at Oxford International College is informed by an inclusive, anti-discriminatory approach that seeks to understand each student's lived experience and remove barriers to support.

We are also particularly alert to additional needs for a student who:

- is disabled or has certain health needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care plan);
- has a mental health need;
- is a young carer;
- is pregnant and/or is a parent themselves;
- has exhibited early signs of abusive, violent and/or harmful behaviours;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- has been repeatedly removed from the classroom or experienced multiple suspensions;
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation;
- is at risk of being radicalised into terrorism;
- has a parent or carer in custody, or is affected by parental offending;
- lives in circumstance presenting challenges for them, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing alcohol and other drugs themselves;
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage;
- or is a privately fostered child.

- **We remain professionally curious.**

Safeguarding requires more than responding to disclosures. Staff are aware of the indicators of abuse, neglect, exploitation and modern slavery, understanding that students can be at risk of harm inside and outside of the College, of the home, and online.

Staff remain alert to patterns, changes in behaviour and contextual factors that may indicate increasing vulnerability. Where uncertainty exists, we ask questions, seek advice, share information appropriately and continue exploring concerns until we are satisfied that students are safe.

- **We create a culture where concerns are welcomed.**

Students should always feel safe asking for help. Staff should always feel confident raising safeguarding concerns, sharing professional observations and seeking advice whenever they are uncertain.

Professional challenge is expected. Staff are encouraged to question decisions, respectfully challenge practice where they believe a student's welfare may be at risk and contribute openly to safeguarding discussions.

Concerns about the conduct or behaviour of adults, including low-level concerns, are taken seriously and reported in accordance with the College's procedures. Creating a culture of openness, transparency and accountability helps protect both students and staff.

Safeguarding discussions are always focused on achieving the best outcomes for students.

- **We continually improve.**

Safeguarding practice is continually evolving. All staff, whether they work directly with students or not, read Part One of Keeping Children Safe in Education (KCSIE). Staff also read safeguarding reminders, quizzes or updates in the weekly staff bulletin.

We also recognise that we learn from experience. We reflect on safeguarding practice, review our procedures, respond to emerging risks and adapt to changes in legislation, research and technology. Continuous improvement is an essential part of maintaining the highest standards of safeguarding across the College.

3. Safeguarding in Practice

Safeguarding concerns are recorded using the College's electronic safeguarding recording system (**CPOMS**), ensuring that information is captured accurately, shared appropriately and reviewed in context.

Safeguarding oversight is maintained through the College's regular multidisciplinary safeguarding meetings, known as **NEST** (Notice Early, Safeguard and Track). These meetings bring together key safeguarding professionals including Student Services, Pastoral, Boarding, Medical and Counselling members. Together with the DSL and DDSs, they review concerns, identify emerging patterns, evaluate risk, monitor the effectiveness of support plans and coordinate safeguarding decisions quickly, centred on the student's welfare. This multidisciplinary safeguarding structure ensures that decisions are informed to respond holistically to students' needs. The Student Services Manager also serves as the College's CPOMS Administrator, providing oversight of safeguarding records and supporting the effective management and continuity of safeguarding information.

Where necessary, the College works in partnership with Children's Social Care, the Police, health professionals, the Local Authority Designated Officer (LADO), the Oxfordshire Safeguarding Children Partnership and other relevant agencies to ensure students receive the right support at the right time.

Safeguarding decisions are informed by the student's lived experience, the wider context of their life and an understanding that vulnerability often develops over time rather than through a single event. We recognise that effective safeguarding depends upon seeing the whole picture, identifying patterns and responding early.

Information is shared appropriately between those who need to know, enabling timely decision-making and support while respecting confidentiality and data protection requirements.

Regular safeguarding oversight by Governors and the Principal enables the College to monitor safeguarding effectiveness, identify emerging themes, review risk and strengthen safeguarding practice through continuous evaluation and improvement.

PART TWO - GOVERNANCE AND RESPONSIBILITIES

4. Legislative Framework

Safeguarding at Oxford International College is delivered within the statutory and regulatory framework set out below. This policy reflects current legislation, statutory guidance and local safeguarding arrangements. It is reviewed regularly (at least annually) to ensure it remains accurate, effective and responsive to developments in safeguarding practice.

4.1 Legislation

- Children Act 1989
- Children Act 2004
- Education Act 2002 (Section 175)
- Safeguarding Vulnerable Groups Act 2006
- Children and Social Work Act 2017
- Equality Act 2010
- Human Rights Act 1998
- Data Protection Act 2018 and UK GDPR
- Data (Use and Access) Act 2025
- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Sexual Offences Act 2003
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Online Safety Act 2023
- The Children's Wellbeing and Schools Act 2026
- The Crime and Policing Act 2026

4.2 Statutory Guidance

- *Keeping Children Safe in Education* 2026
- *Working Together to Safeguard Children* 2026
- National Minimum Standards for Boarding Schools
- Oxfordshire Safeguarding Children Partnership procedures

Where legislation and guidance change between scheduled policy reviews, the College will implement any necessary amendments without delay and formally update this policy at the earliest opportunity.

The Governing Body is responsible for ensuring that safeguarding arrangements remain compliant with statutory requirements and that appropriate systems are in place to monitor their effectiveness.

5. Roles and Responsibilities

Every member of the College community has a responsibility to safeguard and promote the welfare of students. While responsibilities differ according to role, safeguarding depends upon clear leadership, individual accountability and collaborative working across the College.

5.1 Governing Body

The Governing Body provides strategic leadership and oversight of safeguarding at OIC. It ensures that safeguarding remains central to the College's culture, decision-making and strategic planning.

The Governing Body will:

- ensure the College complies with its statutory safeguarding duties and that safeguarding arrangements are effective, student-centred and reviewed regularly;
- appoint an appropriately trained Designated Safeguarding Lead (DSL), ensuring they have the status, authority, time, funding, training and resources necessary to fulfil their responsibilities effectively;
- appoint a nominated Safeguarding Governor to provide oversight of safeguarding on behalf of the Governing Body, support effective governance and maintain regular liaison with the DSL, while recognising that safeguarding remains the collective responsibility of the Governing Body;
- ensure safeguarding policies, procedures and training are reviewed at least annually and implemented consistently across the College;
- receive regular safeguarding reports that enable effective scrutiny, challenge and strategic oversight while maintaining appropriate confidentiality;
- ensure a whole-College approach to safeguarding, recognising that safeguarding is embedded across leadership, teaching, boarding, pastoral care and all aspects of college life;
- monitor safeguarding effectiveness through audits, safeguarding data, student and staff voice, quality assurance activities and external review where appropriate;
- ensure lessons learned from safeguarding practice reviews, local and national safeguarding reviews, complaints, low-level concerns and emerging risks inform continuous improvement;
- ensure all staff, governors and relevant volunteers receive appropriate safeguarding training and read and understand *Keeping Children Safe in Education*.

Safeguarding is a standing item within the Governing Body's termly meetings.

5.2 Principal

The Principal is responsible for ensuring safeguarding is embedded in the College's leadership, culture and daily practice.

The Principal will:

- promote a culture in which safeguarding is understood to be everyone's responsibility;
- ensure students' welfare is given appropriate priority in strategic and operational decision-making;
- support and challenge safeguarding leads appropriately;
- ensure safeguarding concerns involving staff are managed promptly and appropriately;
- foster an environment in which students and staff feel confident raising concerns;
- ensure sufficient staffing, training and resources are available to maintain effective safeguarding arrangements.

5.3 Designated Safeguarding Lead (DSL)

The DSL provides strategic and operational leadership for safeguarding across the College, ensuring safeguarding arrangements are effective, consistent and centred on students' best interests. They chair the College's multidisciplinary safeguarding forum, NEST (Notice Early, Safeguard and Track), through which safeguarding concerns are reviewed, risk is assessed, support is coordinated and emerging themes are identified.

The full responsibilities of the DSL are set out in Appendix A. In summary, the DSL will:

- provide expert safeguarding advice and support;

- oversee safeguarding referrals and multi-agency working;
- maintain oversight of safeguarding records and decision-making;
- identify patterns, trends and emerging risks;
- coordinate support for vulnerable students;
- lead safeguarding training and awareness;
- monitor the effectiveness of safeguarding practice;
- advise the Governing Body and Senior Leadership Team on safeguarding matters.

The DSL is a member of the Senior Leadership Team and has appropriate authority to take immediate safeguarding decisions where necessary to protect students.

5.4 Deputy Designated Safeguarding Leads (DDSLs)

Deputy Designated Safeguarding Leads support the DSL in delivering the College's safeguarding responsibilities and are trained to undertake the full responsibilities of the role when required.

The College's Deputy DSLs represent key areas of college life, including compliance and pastoral leadership, counselling and student administration.

5.5 All Staff

Every member of staff has a safeguarding responsibility and is expected to:

- read and understand this Safeguarding and Child Protection Policy and comply with its requirements;
- read Part One of Keeping Children Safe in Education 2026, understand it and comply with its requirements;
- recognise indicators of abuse, neglect and exploitation;
- place students' welfare at the centre of every decision, in their best interests;
- know and understand the signs of abuse, neglect, exploitation and harm;
- exercise professional curiosity;
- report safeguarding concerns immediately in accordance with college procedures;
- maintain accurate and timely safeguarding records;
- maintain appropriate professional boundaries;
- undertake safeguarding training and apply it consistently in practice.

Staff must never assume that someone else will report a concern.

5.6 Safeguarding cover rota

The College operates a 24-hours a day, 7 days a week, 365 days a year safeguarding rota, ensuring that an appropriately trained DSL or DDSL is always available to respond to safeguarding concerns.

The safeguarding duty rota is published to all staff through the Staff Bulletin, with the member of the safeguarding team on duty highlighted each week within the safeguarding update. This ensures that staff always know who to contact for safeguarding advice or to report concerns.

Deputy DSLs have appropriate access to safeguarding records and systems to ensure continuity of safeguarding oversight, decision-making and support.

PART THREE - SAFEGUARDING PRACTICE

The College provides duty of care to all students, regardless of age.

Students aged 18 and over continue to receive pastoral care, wellbeing support and safeguarding where

concerns arise. Where an adult student is experiencing abuse, exploitation, coercion, mental ill health or other forms of vulnerability, the College will provide appropriate support and, where necessary, work with external agencies in accordance with relevant legislation and guidance.

Safeguarding decisions involving adult students will respect their rights, wishes and autonomy wherever possible, while recognising that the College also has safeguarding responsibilities towards younger students and the wider College community.

The College's multidisciplinary safeguarding arrangements are coordinated through NEST (Notice Early, Safeguard and Track), the College's weekly safeguarding meeting. However, every member of staff plays an important role in recognising concerns, sharing information and ensuring that students receive the right support at the earliest opportunity.

6. Recognising, Responding to Safeguarding Concerns, Recording

Safeguarding concerns are managed through a consistent process.



6.1 Recognising Concerns

Safeguarding concerns do not always begin with a disclosure. Abuse, neglect, exploitation and safeguarding issues are rarely standalone events and may not be covered by one definition or one label alone. In most cases, multiple issues will overlap.

More commonly, concerns emerge through changes in a student's behaviour, presentation, attendance, wellbeing, relationships or academic engagement. **No concern is too small to report.** Small changes, when considered alongside other information, may indicate increasing vulnerability. Staff are expected to remain professionally curious, recognise emerging patterns and act whenever they have a concern about a student's welfare.

Students may experience multiple forms of extra-familial harm, including sexual abuse and exploitation, teenage relationship abuse, criminal and financial exploitation, serious violence, county lines and radicalisation. Technology is a significant component of many safeguarding concerns and may enable or intensify abuse occurring offline. Students may also abuse other students online, including through abusive or discriminatory communications, sexual harassment, consensual or non-consensual creation or sharing of nude or semi-nude images, and the sharing of abusive or sexual content.

Where there is any uncertainty, staff will seek advice from the Designated Safeguarding Lead (DSL) or a Deputy DSL without delay. They can also refer to the indicators of abuse and neglect in KCSIE 2026.

6.2 Responding to Concerns

All safeguarding concerns must be reported immediately to the DSL or a Deputy DSL through CPOMS or through Teams if there is no access to the platform.

Staff are not expected to investigate concerns or determine whether abuse has occurred. Their responsibility is to notice concerns, record relevant information accurately and report it promptly.

Where a student is believed to be at immediate risk of significant harm, protecting the student takes priority over all other considerations. Staff will take immediate action to secure the student's safety, including contacting the emergency services (999) where necessary, before informing the DSL at the earliest opportunity.

6.3 Responding to a Disclosure

A student may choose to disclose abuse, neglect or another safeguarding concern directly, gradually over time or through changes in behaviour.

The response of the adult receiving the disclosure can have a significant impact on the student's confidence in seeking further help.

When responding to a disclosure, staff will:

- remain calm and listen carefully;
- allow the student to speak freely and at their own pace;
- take what the student says seriously;
- reassure the student that they have done the right thing by speaking;
- explain that information cannot be kept confidential where there are safeguarding concerns;
- avoid asking leading or investigative questions;
- make an accurate factual record as soon as possible;
- record the student's voice in their own words as much as possible;
- report the concern immediately to the DSL or Deputy DSL.

Staff will not:

- promise confidentiality;
- investigate the concern themselves;
- ask questions intended to establish evidence;
- confront alleged perpetrators;
- delay reporting.

6.4 Recording Safeguarding Concerns on CPOMS

Members of staff should never assume that someone else will pass on information which may be important to protecting a student. Concerns must be recorded promptly and accurately on CPOMS.

Safeguarding records support ongoing risk assessment, safeguarding decision-making and multi-agency working. Therefore, records should:

- be completed as soon as possible after the concern arises;
- be factual, clear and objective;
- distinguish between fact, observation and professional opinion;
- record the student's own words wherever possible;
- include actions taken and decisions made;
- identify any follow-up actions required.

Detailed guidance on how to write an effective and accurate safeguarding report can be found in Appendix D.

6.5 Safeguarding Decision-Making

The DSL team reviews each safeguarding concern individually, taking account of:

- the student's lived experience, wishes and feelings;
- the nature and seriousness of the concern;
- previous safeguarding information;
- known vulnerabilities and protective factors;
- contextual safeguarding considerations;
- advice from partner agencies where appropriate;
- statutory safeguarding thresholds.

Following assessment, the DSL team will determine the most appropriate course of action. This may include:

- continued monitoring;
- pastoral or wellbeing support;
- Family Help or other early intervention;
- referral to Children's Social Care;
- referral to the Police;
- referral to specialist support services; or
- ongoing safeguarding oversight.

Every safeguarding decision will be recorded, together with the rationale supporting that decision, on CPOMS.

6.6 Confidentiality

All staff have a responsibility to respect the confidentiality of safeguarding information. However, staff must never promise a student that information will be kept confidential to them. Students should instead be informed, in an age-appropriate manner, that information will only be shared with those who need to know in order to keep them or others safe.

Staff should never create a copy of a CPOMS entry or any other safeguarding document.

When a student transfers to another education provider, safeguarding records will be transferred securely and without delay in accordance with statutory guidance. The College will retain evidence that the records have been transferred successfully.

The College recognises that safeguarding and child protection responsibilities may require confidential information to be shared without consent where this is necessary to protect a student from harm or to comply with statutory duties.

7. Family Help

Family Help provides support for children and families where needs are emerging or where additional help may stop concerns from escalating. All staff should be alert to circumstances in which a student or family may benefit from additional support and understand the local thresholds for Family Help and statutory intervention.

The [Oxfordshire Threshold of Needs](#) provides a framework for determining the level of support or intervention a child and family may require:

- Universal and community support – needs can be met through universal services, the College's pastoral and wellbeing provision, or other community-based support.
- Family Help – additional or emerging needs require coordinated support involving the child, family and relevant professionals. Oxfordshire's Locality and Community Support Service (LCSS) can provide advice and support, including Strengths and Needs assessments and Team Around the Family arrangements.

- Child in Need – section 17 Children Act 1989 – the child's health or development is likely to be significantly impaired without additional services, requiring assessment and support from Children's Social Care.
- Child Protection – section 47 Children Act 1989 – there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. This requires referral to Children's Social Care without delay.

At OIC, staff who identify an emerging need or safeguarding concern must record it on CPOMS and discuss it promptly with the DSL or a Deputy DSL. The safeguarding team will consider the concern against the [Oxfordshire Threshold of Needs](#) and determine whether the appropriate response is College-based support, Family Help, a section 17 referral or child protection action.

Where there is concern that a child is suffering, or is likely to suffer, significant harm, a referral to Children's Social Care must not be delayed. Where a child is in immediate danger, the police must be contacted immediately.

8. Multi-Agency Working

Safeguarding is most effective when organisations work together to identify need, assess risk and provide coordinated support.

Where appropriate, the DSL team works in partnership with:

- Children's Social Care;
- the Multi-Agency Safeguarding Hub (MASH);
- the Police;
- health professionals;
- the Local Authority Designated Officer (LADO);
- the Oxfordshire Safeguarding Children Partnership;
- Family Help services;
- education providers;
- and other statutory or specialist agencies involved in supporting the student.

The DSL will make referrals, seek advice and share information in accordance with statutory guidance and local safeguarding procedures.

8.1 Participation in Multi-Agency Processes

The College will actively participate in multi-agency safeguarding processes and recognises the important contribution education makes to safeguarding assessments and decision-making.

Where required, the DSL will attend and contribute to:

- Child Protection Conferences;
- Core Group meetings;
- Strategy Discussions and Strategy Meetings;
- Family Help meetings;
- Team Around the Family meetings;
- Child Safeguarding Practice Reviews;
- and other safeguarding meetings relevant to the student's needs.

The DSL will provide timely information, professional opinion and safeguarding records to support effective decision-making by partner agencies.

8.2 Professional Challenge

Effective safeguarding relies upon constructive professional challenge.

Where the DSL believes that a student's needs are not being adequately addressed, or where safeguarding decisions require further clarification or review, the DSL will respectfully challenge partner agencies in the best interests of the student.

Equally, the College welcomes professional challenge from partner agencies and values open, honest and respectful dialogue as an essential part of effective safeguarding practice.

8.3 Continuity of Support

The DSL recognises that referrals to external agencies do not transfer responsibility for safeguarding.

While statutory agencies lead on their respective responsibilities, the College continues to provide pastoral support, monitor students' welfare, contribute to safeguarding planning and share relevant information throughout the period of agency involvement.

Support plans are reviewed regularly to ensure they remain effective and responsive to the student's changing needs.

9. Boarding Safeguarding

Boarding at Oxford International College is more than accommodation; for many students it is their home for much of the year. Many are living away from their families and home countries and may experience cultural, linguistic or emotional barriers to seeking help while adapting to a new education system, greater independence and life within a diverse international community.

The residential nature of boarding also creates additional safeguarding considerations. Students spend extended periods in the care of the College and alongside other students during evenings, nights and weekends. Boarding arrangements therefore take account of the particular risks associated with residential life through staffing and supervision, risk assessment, security, student education and safeguarding procedures.

Our boarding provision is designed to provide a safe, supportive and inclusive environment in which students feel known, respected and cared for and can thrive personally and academically.

9.1 Continuous Safeguarding and Pastoral Care

Boarding is staffed 24 hours a day throughout term time and during holiday periods whenever students remain in residence, ensuring that students always have access to appropriately trained adults.

House Parents are at the heart of the College's pastoral provision and are supported by the Head of Boarding and Assistant Head of Boarding. Their regular contact with students enables them to build trusted relationships, promote wellbeing and independence, and notice changes in behaviour, relationships, routines or emotional wellbeing that may indicate an emerging concern.

During the night, dedicated awake Night House Parents provide continuous safeguarding oversight across the boarding houses. Regular patrols, welfare checks and immediate response to student needs mean that appropriately trained support is available throughout the night and concerns can be identified and acted upon promptly.

Boarding staff work closely with academic staff, nurses, the pastoral and wellbeing teams and the DSL to discuss students of concerns in a weekly Pastoral Link Meeting (PLM). Significant or developing concerns may also be recorded on CPOMS and reviewed through NEST, enabling coordinated assessment, support and

safeguarding action.

9.2 Safeguarding the Residential Environment

Residential environments require particular attention to students' privacy, security, supervision and contact with adults and other students. Boarding and contextual risk assessments consider the individual characteristics of each residential site and are reviewed where circumstances or risks change.

Consideration is given to:

- the age, maturity and vulnerability of students allocated to accommodation;
- room allocation and the layout of residential areas;
- appropriate separation of under-18 and over-18 students;
- gender, privacy and personal space;
- controlled access to bedrooms, corridors and other residential areas;
- staffing, supervision and overnight arrangements;
- staff accommodation and appropriate separation between staff and student living areas;
- security, visitors and access arrangements;
- communal spaces and periods of less structured activity; and
- contextual risks associated with other residents, organisations or users where sites or facilities are shared.

Where accommodation forms part of a wider or shared residential site, the College liaises with site managers, landlords and other relevant organisations to identify and mitigate safeguarding risks.

Students are inducted into boarding rules relating to bedrooms, residential areas, visitors, privacy and communal spaces and are expected to respect the personal space and boundaries of others.

9.3 Professional Boundaries in Boarding

The informal and domestic nature of boarding can create particular professional-boundary risks. Boarding staff must maintain the same high standards of professional conduct during evenings, overnight duties, weekends and informal interactions as at any other time.

Students must not access staff accommodation except where specifically authorised in an emergency or exceptional circumstance in accordance with college procedures.

Any concern about the conduct of an adult, including where a professional boundary may have been compromised, must be reported in accordance with the College's Low-Level Concerns, Staff Code of Conduct and safeguarding procedures.

9.4 Child-on-Child Abuse and Relationships in Boarding

Living alongside peers for extended periods can increase opportunities for child-on-child abuse and may allow harmful behaviours or unhealthy relationship dynamics to develop away from the more structured college day.

Boarding staff remain particularly alert to changes in friendships, social groups and behaviour, and to concerns involving:

- bullying, harassment or intimidation;
- discriminatory behaviour, including racism and faith-targeted abuse;
- coercion, control or exploitation;
- sexual harassment, sexual violence or harmful sexual behaviour;
- power imbalances arising from age, maturity, experience or vulnerability;
- privacy and personal boundaries;

- online interactions and group-chat behaviour; and
- harmful behaviour becoming normalised within a residential peer group.

Friendships and relationships naturally develop within the boarding community. The College does not seek to prevent appropriate relationships between students; however, consent is never assumed because students are in a relationship, and staff remain alert to differences in age, maturity, experience, vulnerability or legal status that may affect power and consent.

Rules governing access to bedrooms and residential areas help protect students' privacy and minimise opportunities for inappropriate or harmful behaviour. These expectations apply to all students irrespective of age, gender or the nature of their relationship.

Child-on-child abuse will never be dismissed as banter, relationship difficulties or an inevitable part of boarding life. Concerns involving sexual violence, sexual harassment, harmful sexual behaviour, discriminatory behaviour, including racism and faith-targeted abuse, coercion or exploitation are managed through the College's safeguarding procedures.

9.5 Living and Learning in a Mixed-Age Community

Oxford International College educates students aged 14 to 20 and its boarding community therefore includes both children and students who are legally adults.

Older students can make a positive contribution to boarding as peers and role models. However, differences in age, maturity, experience and legal status may create actual or perceived power imbalances. Safeguarding risk assessments, accommodation arrangements, supervision and boarding practice take account of these differences.

When students reach the age of 18, they meet with their Head of Year to discuss the additional rights, responsibilities and expectations associated with adulthood within the college community. These are reinforced through the Life Skills Programme, including consent, healthy relationships, personal accountability, decision-making, and digital safety.

Students aged 18 and over are expected to:

- recognise that younger students may be more vulnerable because of their age, maturity or experience;
- maintain appropriate boundaries and relationships with younger students;
- act responsibly in relation to the additional legal freedoms available to them;
- never use their age or legal status to facilitate younger students' access to age-restricted substances, activities, venues, material or services;
- seek help for themselves or others where they have safeguarding or welfare concerns; and
- contribute positively to a safe and respectful boarding community.

Students aged 18 and over must not purchase or supply alcohol, tobacco, vaping products or other age-restricted items for students who are under the legal age to obtain them. College and boarding expectations continue to apply irrespective of freedoms an adult student may legally exercise outside College.

Relationships or behaviour that exploit differences in age, maturity or vulnerability, or otherwise create safeguarding concerns, are managed in accordance with the College's safeguarding and behaviour procedures.

9.6 Online Safety in Boarding

For OIC's international boarders, personal devices provide an important means of maintaining contact with family and friends overseas as well as supporting education and participation in college life. However, private and extended access to technology during evenings and overnight can create additional safeguarding risks.

Boarding staff remain alert to online activity that may affect a student's safety, sleep, emotional wellbeing, relationships or engagement with education. Particular risks include:

- cyberbullying, harassment and harmful group-chat behaviour;
- grooming, exploitation and unsafe online relationships;
- radicalisation and exposure to harmful or illegal content;
- sharing nude or semi-nude images, live streaming and sextortion;
- digitally altered or AI-generated sexual imagery and deepfakes;
- scams, impersonation, phishing and financial exploitation;
- excessive device use and gaming; and
- online gambling.

The College maintains appropriate filtering and monitoring arrangements on boarding networks. Students are educated through Life Skills about safe and responsible technology use, digital footprints, privacy, healthy online relationships and how to seek help. International students may be particularly vulnerable to sophisticated scams and technology-enabled fraud, including criminals impersonating police, government agencies, banks or other trusted organisations. Staff, students and parents are kept informed of relevant trends and safeguarding education is adapted in response to emerging risks.

Online safeguarding concerns are recorded on CPOMS and managed through the College's safeguarding procedures and relevant Online Safety and ICT policies.

9.7 Safeguarding Education, Student Voice and Reporting

All boarders receive safeguarding information as part of their induction and throughout their college experience. This helps students to:

- recognise behaviour from adults or other students that may be unsafe or inappropriate;
- understand privacy, personal boundaries, healthy relationships and consent;
- recognise coercion, exploitation and abuse;
- understand online and financial safeguarding risks;
- know how to seek help for themselves or another student; and
- understand that concerns will be taken seriously.

Safeguarding education is reinforced through Life Skills, boarding activities, tutor provision, assemblies and other opportunities throughout the year and is adapted where safeguarding information, student voice or emerging risks indicate that additional input is required.

Boarders have several routes through which they can seek help and are not dependent upon reporting to a particular member of staff. They may speak to any trusted adult and have access to the College's Tell Us reporting route, Whisper for anonymous reporting, and Independent Persons who they can contact independently.

The College actively seeks boarders' views about their safety and experience of residential life through surveys and other student voice activities. Safeguarding and Boarding leaders consider this feedback alongside safeguarding records, welfare information and emerging patterns to identify aspects of boarding practice or particular locations requiring further attention.

9.8 Educational Guardians and Partnership Working

Every boarding student has a vetted Educational Guardian who works in partnership with the College, parents and boarding staff to support the student's welfare and provide additional support where required.

Educational Guardians are important safeguarding partners. Appropriate information is shared in accordance

with safeguarding and data protection requirements to ensure that students receive coordinated, consistent and well-informed support.

The College also works collaboratively with parents, guardians, health professionals and external agencies whenever this is necessary to safeguard and promote students' welfare.

10. Other Specific Safeguarding Risks

Safeguarding risks continue to evolve and affect students in different ways according to their age, experiences, vulnerabilities and personal circumstances.

Staff are not expected to become experts in every safeguarding issue. They are expected to recognise possible indicators of harm, remain professionally curious, respond appropriately and report concerns without delay.

While the safeguarding risks outlined in this chapter are relevant to all schools, the College's international boarding context shapes how these risks are understood, assessed and managed. **This chapter should be read alongside Keeping Children Safe in Education 2026, which provides detailed statutory guidance, and Appendix C of this policy.**

10.1 Child-on-Child Abuse (including harassment and violence)

Children can abuse other children. At OIC, this means that students can abuse other students. It may occur inside or outside the College, in Boarding, at home or online.

Child-on-child abuse will never be dismissed as banter, growing up, part of boarding life or simply a normal part of adolescent behaviour. All staff are expected to challenge inappropriate behaviours between students and report them to the DSL.

It can include:

- bullying, prejudice-based and discriminatory bullying, including racism and faith-targeted abuse;
- abuse in intimate personal relationships between students (including 'teenage relationship abuse');
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- serious physical assault and harm, or the threat of harm with a weapon;
- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing, enticing or forcing someone to engage in sexual activity without consent, such as stripping, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude or semi-nude images and videos;
- upskirting;
- initiation or hazing-type behaviours.

Child-on-child abuse rarely occurs in isolation. Safeguarding decisions will consider the wider context in which the behaviour has occurred, including:

- relationships and friendship groups;
- boarding arrangements;
- age and developmental stage;
- differences in maturity;
- power imbalances;

- online environments;
- peer-group norms;
- cultural and social factors;
- previous experiences of abuse or trauma;
- vulnerability;
- discrimination;
- the location in which incidents occur; and
- whether wider groups of students may also be affected.

The safeguarding team will seek to understand the lived experience of all students involved rather than considering an incident solely as an isolated behavioural event.

Terms such as victim and alleged perpetrator may be used where appropriate, but not every child who has experienced abuse will identify themselves as a victim. Equally, a child who displays harmful behaviour may themselves have experienced abuse, exploitation, trauma or other adversity.

Language should therefore be child-centred, proportionate and avoid unnecessarily labelling children. The terms used with individual students will take account of their wishes, circumstances and understanding.

10.2 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Child criminal exploitation and child sexual exploitation are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity.

Exploitation may involve coercion, manipulation, deception or violence and can affect any student regardless of age, gender, ethnicity, background or ability. It can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group. It may constitute modern slavery and a referral should be completed ([Modern Slavery statutory guidance](#)).

Staff should remain particularly alert to indicators including:

- unexplained money, gifts or possessions;
- changes in friendship groups or relationships;
- association with older individuals or groups;
- unexplained or repeated absence;
- unexplained injuries;
- changes in behaviour or emotional wellbeing;
- secretive use of phones or other technology;
- controlling or coercive relationships;
- unexplained travel;
- involvement in criminal activity; and
- signs that a student may be acting under pressure, coercion or threat.

A child may not recognise that they are being exploited and apparent consent does not mean that exploitation has not occurred.

Child Sexual Exploitation (CSE) may involve contact or non-contact sexual abuse, including the creation or sharing of sexual images, exposure to sexual content or activity, and grooming, including online. It may occur over time or as a single incident and can take place without the child's immediate knowledge. Children aged 16 and 17 can also be sexually exploited despite being able to legally consent to sexual activity. A child may believe they are in a genuine romantic relationship and may not recognise the exploitation. Victims should be

recognised as such and not criminalised for actions undertaken as a result of coercion or exploitation.

Child Criminal Exploitation (CCE) may involve children being drawn into activities such as transporting drugs or money, theft, vehicle crime or serious violence. Children may become trapped through violence, threats to themselves or their families, or debt, and may carry weapons through coercion or for perceived protection. Staff should recognise that CCE may present differently in girls and boys and that children who are criminally exploited may also be at increased risk of sexual exploitation.

10.3 Online Safety, Cybercrime, Artificial Intelligence and Filtering and Monitoring

Technology is integral to students' education and daily lives. However, it is essential that students are safeguarded from potentially harmful and inappropriate online material. The College adopts a whole-College approach to online safety, recognising both the opportunities and risks presented by digital technologies.

Staff remain alert to risks including:

- online abuse and grooming;
- cyberbullying;
- exposure to harmful or illegal content;
- misinformation, disinformation and deepfakes;
- technology-enabled sexual abuse;
- coercion or exploitation through online platforms;
- non-consensual image sharing;
- online fraud, financial exploitation and technology-enabled scams;
- the misuse of artificial intelligence, including generative AI.

Appropriate filtering and monitoring systems are in place to support students' safety while using the College's IT systems. The College uses Fortinet for filtering internet content, and Smoothwall on college devices. The DSL works with IT staff, senior leaders and relevant providers to ensure that safeguarding risks arising through technology are appropriately identified and managed.

The process, set out in Appendix A of the Positive Behaviour policy, includes:

- clear roles and responsibilities for filtering and monitoring;
- reviewing filtering and monitoring provision quarterly by IT and DSL;
- checking filtering on all internet-connected devices in all relevant locations, and a record shared with Governors;
- seeking to block harmful and inappropriate content without unreasonably restricting teaching and learning;
- maintaining appropriate monitoring arrangements;
- considering the age and vulnerabilities of students when assessing risk; and
- ensuring staff understand their responsibilities in relation to filtering and monitoring.

The four areas of risk can be categorised as:

- *content* – exposure to illegal, inappropriate or harmful material;
- *contact* – harmful interactions with other users, including grooming and exploitation;
- *conduct* – behaviour online that causes or increases the risk of harm; and
- *commerce* – risks including scams, fraud, gambling and inappropriate advertising.

These risks increasingly include the use of artificial intelligence and emerging technologies, including manipulated or AI-generated images, deepfakes, impersonation, misinformation and disinformation, AI-enabled exploitation and technology-enabled fraud.

10.4 Mobile Phones and Personal Devices

Mobile phones and personal devices form an integral part of students' daily lives and can support communication, learning and wellbeing. However, they may also increase safeguarding risks, including cyberbullying, harmful online content, image sharing, online exploitation, inappropriate contact, distraction from learning, and unauthorised recording or distribution of images or information.

In College, phones cannot be seen or heard. Year 11 students hand-in their phone at the start of the day and collect them before returning to Boarding or home. During the day, if a student needs to make a call for family, health or other reason, they organise with Reception to take their call in the meeting room of London Place.

Staff are expected to remain alert to safeguarding concerns arising from the use of personal devices and to respond in accordance with the College's Mobile Phone Policy. Students receive age-appropriate education through the Life Skills programme to promote the safe, responsible and respectful use of technology.

10.5 Technology-Enabled Fraud and Financial Exploitation

The College recognises that students, particularly those living away from home or studying internationally, may be vulnerable to technology-enabled fraud, financial exploitation and other forms of online deception.

These risks may include:

- phishing and identity theft;
- impersonation scams;
- sextortion;
- investment and cryptocurrency fraud;
- employment and accommodation scams;
- romance scams;
- scams involving individuals falsely claiming to represent government agencies, banks, universities or law enforcement;
- virtual kidnapping and other coercive scams targeting students or their families.

The College provides education through its safeguarding, digital literacy and personal development programmes to help students recognise, avoid and report these risks.

Where a student is believed to have been targeted by fraud or exploitation, appropriate safeguarding support will be provided and, where necessary, the College will work with parents, guardians, financial institutions, the Police or other agencies.

10.6 Children who are Questioning their Gender

The College recognises that children who are questioning their gender may have additional vulnerabilities and will respond sensitively, respectfully and with professional curiosity. Gender questioning will be approached within the College's safeguarding and wellbeing framework, and any associated bullying, discrimination or safeguarding concerns will be addressed.

The College will not initiate social transition. Any request for support involving social transition will be considered individually, with appropriate parental involvement and DSL oversight, taking account of the child's wishes, best interests and welfare, and the College's safeguarding and legal obligations. The College adheres to biological sex, and adjustments may be put in place as appropriate to meet individual needs whilst maintaining single sex toilets and sports/trips arrangements as outlined below.

The College records accurate information regarding biological sex on ISAMS.

Toilets in the College are age and gender specific. Boarding facilities are all single occupancy en-suite accommodation so there are no shared showers facilities. Boarding Houses are Gender specific, and clusters are organised according to age brackets with over 18 accommodated in separate studios or clusters in Wavy Gate, or in our over-18 accommodation in Alice House. For Sports and trips, relevant arrangements will be managed in accordance with statutory requirements and College guidance.

Further detail, including arrangements for parental involvement, social transition, confidentiality, students living in stealth, detransition, records, facilities and sport, is set out in the College's Gender-Questioning Children Guidance.

10.7 Mental Health and Wellbeing

Mental health and wellbeing are closely linked to safeguarding.

Mental health concerns may not in themselves constitute a safeguarding issue. However, they may become a safeguarding concern where a student is at risk of harm to themselves or others or where they are particularly vulnerable to abuse, neglect or exploitation.

Staff are expected to report concerns relating to a student's emotional wellbeing through the ISAMS Wellbeing module so that appropriate support is considered at the earliest opportunity. Entries are discussed in the PLM and in NEST to ensure no student falls through the gap and in order to build the wider picture around the person.

10.8 Serious Violence

Indicators which may suggest that a student is at risk of serious violence or involvement in criminal activity may include increased absence, unexplained injuries, changes in friendships, possession of weapons, involvement in anti-social behaviour or unexplained financial circumstances.

Concerns must be referred to the DSL without delay.

10.9 Contextual Safeguarding

Risks to students may arise beyond their family environment.

Safeguarding assessments consider the wider contexts in which students live, learn and socialise, including boarding accommodation, friendship groups, online environments, the wider Oxford setting as well as local communities and other international settings where harm may occur or have occurred.

A separate Local Area Risk Assessment reviews and records risks.

10.10 Domestic Abuse

Domestic abuse can have a significant impact upon children and young people, whether they experience it directly or witness it within the home. As per KCSIE 2026, staff are aware that Domestic Abuse also encompasses child-to-parent/caregiver abuse. Domestic abuse is a safeguarding concern, and the College will provide appropriate support for affected students while working with partner agencies where necessary.

The DSL is the key contact for Operation Encompass. However, the College also takes responsibility where Domestic Violence may occur in the student's home country, and the DSL will work with the relevant Authorities in the UK and abroad to protect the student.

10.11 Honour-Based Abuse, Forced Marriage and Female Genital Mutilation (FGM)

Honour-based abuse encompasses a range of harmful practices, including forced marriage and female genital mutilation. Staff are aware of potential indicators and understand their statutory safeguarding responsibilities.

Where there is reason to believe that a student may be at risk, immediate safeguarding action will be taken. This includes contacting the police if FGM is suspected.

10.12 Preventing Radicalisation

The College fulfils its duties under the Prevent Duty and recognises that protecting students from radicalisation forms part of its wider safeguarding responsibilities.

The Prevent Lead for Oxford International College is Ben Holman, Vice Principal Pastoral. Staff receive Prevent training and carry out Government training on a 2-year cycle. Due to the international nature of our student body, staff remain alert to indicators that a student may be vulnerable to radicalisation or extremist influences.

Concerns are managed through the College's safeguarding procedures and, where appropriate, referrals will be made to external agencies, including the Channel programme.

11. Attendance and Student Welfare

Regular attendance is a key safeguarding responsibility and an important indicator of student welfare. The College recognises that poor attendance, repeated absence, unexplained patterns of non-attendance, children missing education (CME) and students whose whereabouts cannot be established may all indicate abuse, neglect, exploitation, mental health concerns or other safeguarding risks.

Attendance is therefore viewed as an important safeguarding indicator rather than simply a measure of academic engagement.

Attendance is monitored proactively throughout the college day using lesson-by-lesson registration and boarding registration processes. The College employs a dedicated Attendance Officer who monitors attendance in real time, investigates unexplained absences and works closely with academic staff, boarding staff, the safeguarding team and other relevant colleagues to ensure concerns are identified promptly and appropriate action is taken.

Information relating to attendance is considered alongside pastoral, boarding, wellbeing and safeguarding information to develop a holistic understanding of each student's welfare and to identify emerging concerns at the earliest opportunity and whether intervention is required.

11.1 Responding to Absence

Unexplained absence is treated seriously.

Where a student is absent unexpectedly, appropriate enquiries will be made without delay to establish their whereabouts and welfare. This may include contacting the student, boarding staff, their friends, parents, guardians or emergency contacts, as appropriate to the circumstances. The Attendance Policy details the steps to undertake when a student is reported as missing.

If concerns cannot be resolved promptly, the matter will be escalated to the Designated Safeguarding Lead (DSL) or a Deputy DSL to determine whether further safeguarding action is required. Decisions will take account of the student's age, known vulnerabilities, previous history, likely whereabouts and any other relevant safeguarding information.

PART FOUR - SAFER RECRUITMENT AND MANAGING CONCERNS ABOUT ADULTS

12. Introduction

Creating a safe environment for students begins with recruiting, developing and maintaining a safe workforce.

Oxford International College recruits, develops and supports staff, volunteers and contractors who share the College's safeguarding values and are suitable to work with children and young people.

Safeguarding does not end when employment begins. Maintaining a safe culture requires high standards of professional conduct, ongoing vigilance, effective supervision and a willingness to respond appropriately whenever concerns arise about an adult working within the College community.

12.1 Safer Recruitment

The College operates robust safer recruitment procedures in accordance with statutory guidance and best practice.

Appropriate pre-employment checks are completed before an individual begins work and include, where applicable:

- identity verification;
- right to work checks;
- enhanced DBS checks, including barred list checks where required;
- prohibition from teaching checks;
- overseas criminal record or suitability checks where appropriate;
- verification of qualifications and professional status;
- satisfactory references;
- health declaration;
- any other checks required by legislation or statutory guidance.

The College maintains a Single Central Record in accordance with statutory requirements.

Safer recruitment principles also apply, where appropriate, to volunteers, agency workers, contractors, visiting professionals and others working with students.

In accordance with Keeping Children Safe in Education 2026 and the Crime and Policing Act 2026, the College applies current regulated activity requirements to staff, volunteers and others working with children. The previous supervision exemption from regulated activity no longer applies. The College will therefore ensure that appropriate DBS and barred list checks are undertaken where required, including for volunteers and relevant work-experience arrangements, and will apply the appropriate safeguarding checks to self-employed individuals, trainee teachers and third-party personnel. Where concerns arise about any such individual, the College will work with the relevant employer, provider or training organisation and make referrals to the Disclosure and Barring Service or other agencies where the statutory criteria are met.

12.2 Professional Conduct

Maintaining the highest standards of professional behaviour is fundamental to safeguarding. All adults working within the College are expected to model appropriate behaviour, maintain professional boundaries and act in accordance with the Staff Code of Conduct and the College's safeguarding procedures.

Professional curiosity, respectful challenge and a willingness to raise concerns are essential features of the College's safeguarding culture.

12.3 Low-Level Concerns

Low-level concerns are recognised, reported and managed promptly within a culture of openness and transparency.

Low-level concerns are those that do not meet the threshold for referral to the Local Authority Designated Officer (LADO), but which may be inconsistent with the Staff Code of Conduct or expected professional standards.

All staff are encouraged to share low-level concerns promptly so that they can be considered appropriately, patterns identified where necessary and professional standards maintained.

Responding proportionately to low-level concerns contributes to safeguarding students, supports staff and promotes a positive safeguarding culture.

12.4 Allegations and Concerns Meeting the Harm Threshold

Any allegation or concern that an adult working within the College may have:

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

will be managed in accordance with statutory guidance and the College's safeguarding procedures. This includes any staff from third-party organisations or trainee teachers.

The Principal (or Chair of Governors where appropriate) will ensure concerns are managed promptly, fairly and confidentially, including consultation with the Local Authority Designated Officer (LADO) where required.

12.5 Whistleblowing

All adults working within the College have a responsibility to raise concerns where they believe safeguarding standards are not being maintained or where the welfare of students may be compromised.

The College promotes a culture in which concerns can be raised openly and professionally without fear of detriment.

Concerns will be taken seriously, considered appropriately and managed in accordance with the College's Whistleblowing Policy.

12.6 Maintaining a Safe Workforce

Safeguarding is strengthened when professional standards are consistently maintained.

Through safer recruitment, effective induction, appropriate supervision, ongoing safeguarding training and a culture of openness, accountability and continuous learning, the College seeks to ensure that every adult working within its community contributes positively to creating a safe environment for students.

13. Safeguarding Training and Professional Development

Safeguarding is most effective when those responsible for protecting students are knowledgeable, confident and committed to continual learning.

Oxford International College recognises that safeguarding is an evolving area of practice. Staff must therefore understand not only their statutory responsibilities, but also emerging safeguarding risks, local safeguarding arrangements and the College's own safeguarding procedures.

Safeguarding training is designed to ensure that every adult working within the College community has the knowledge, skills and confidence to recognise concerns, respond appropriately and contribute to a strong safeguarding culture. However, safeguarding competence is also developed through professional discussion, supervision, reflective practice, multidisciplinary working and learning from safeguarding cases.

13.1 Induction

Every member of staff, volunteer and regular visitor receives safeguarding induction appropriate to their role before working unsupervised with students.

Induction includes, as appropriate:

- the College's Safeguarding Policy;
- the Staff Code of Conduct;
- the identity and responsibilities of the Designated Safeguarding Lead (DSL) and Deputy DSLs;
- reporting safeguarding concerns;
- professional boundaries;
- behaviour expectations;
- whistleblowing arrangements;
- low-level concerns;
- online safety;
- filtering and monitoring;
- promoting positive behaviour;
- attendance;
- safeguarding within a boarding environment.

Staff are expected to read and understand *Keeping Children Safe in Education 2026* in accordance with their statutory responsibilities.

13.2 Ongoing Safeguarding Training

Safeguarding training is not viewed as a one-off event but as an ongoing professional responsibility.

All staff receive annual level 2 safeguarding training and updates in August, delivered every other year by the ESAT team or the DSL who is Train the Trainer trained. Regular safeguarding updates are shared in the weekly bulletin throughout the year to ensure staff remain informed about changes in legislation, safeguarding practice, local procedures and emerging risks. Particular topics are also covered in INSETs, the Tuesday CPD slot or staff meetings.

13.3 Specialist Training

Staff with specific safeguarding responsibilities receive additional training appropriate to their role.

This includes, where appropriate:

- the Designated Safeguarding Lead and Deputy DSLs;
- boarding leadership;
- nurses;
- counsellors;
- attendance staff;
- senior leaders;
- governors;
- staff involved in safer recruitment.

Specialist training is refreshed in accordance with statutory guidance and professional expectations. Level 3 Safeguarding and Safer Recruitment training is updated every 2 years.

13.4 Safeguarding Learning Culture

The College promotes a culture of professional reflection, collaboration and continuous learning.

Learning from safeguarding incidents, local and national safeguarding reviews, inspections, audits, emerging risks and the College's own safeguarding practice is used to strengthen professional judgement, inform future training and continually improve safeguarding arrangements.

The College encourages professional curiosity, respectful challenge and reflective practice as essential characteristics of effective safeguarding.

Staff are encouraged to learn not only from formal training, but also from day-to-day safeguarding practice, recognising that continuous reflection and shared learning strengthen the College's ability to identify concerns early and respond effectively.

13.5 Evaluating Impact

Effective safeguarding training is measured not simply by attendance, but by its impact on professional practice.

The effectiveness of safeguarding training is evaluated through safeguarding audits, quality assurance activities, staff confidence, safeguarding records, professional practice, feedback from students and staff, and governance oversight.

Training programmes are reviewed regularly to ensure they remain relevant, effective and responsive to the evolving safeguarding landscape and the needs of the College community.

14. Monitoring, Quality Assurance and Review

The effectiveness of the College's safeguarding arrangements is monitored through a range of quality assurance activities.

Monitoring includes:

- safeguarding audits;
- review of safeguarding records and trends;
- safeguarding data and analysis;
- attendance and welfare information;
- boarding monitoring;
- student voice;
- staff feedback;
- governance oversight;
- external review and inspection findings.

Safeguarding practice is reviewed regularly in response to safeguarding incidents, complaints, low-level concerns, inspection findings, changes in legislation and statutory guidance, emerging risks, and feedback from students, staff and parents.

Learning from these sources informs policy development, staff training, safeguarding procedures and strategic planning.

15. Governor Ratification

The current version of this policy is published on the College website and made available to staff, students, parents, guardians and other stakeholders as appropriate.

Initial approval by Sue Hill(Safeguarding Governor): 04 September 2026

Date agreed and ratified by Governing Body: XXX

Safeguarding Governor:

Signed:

Susan Hill

Name: Sue Hill

Chair of Governors:

Signed:

Richard Davies

Name: Richard Davies

APPENDIX A – ROLE AND RESPONSIBILITIES OF THE DESIGNATED SAFEGUARDING LEAD

The Designated Safeguarding Lead (DSL) takes lead responsibility for safeguarding and child protection across Oxford International College, including online safety and understanding the filtering and monitoring systems and processes in place.

The DSL is a member of the Senior Leadership Team and has the appropriate status, authority, time, training, resources and support necessary to fulfil the responsibilities of the role effectively.

Deputy Designated Safeguarding Leads (DDSLs) are trained to the same standard as the DSL and may undertake safeguarding activities on behalf of the DSL. However, ultimate lead responsibility for safeguarding and child protection remains with the DSL and cannot be delegated.

Availability

The College ensures that the DSL or a DDSL is available whenever students are in College.

In recognition of the College's boarding provision, Oxford International College operates a 24-hour, 7-day-a-week, 365-day safeguarding rota, ensuring that an appropriately trained DSL or DDSL can be contacted whenever safeguarding advice or action is required.

Appropriate arrangements are maintained to ensure continuity of safeguarding leadership during periods of absence, leave or other circumstances in which the DSL is unavailable.

Managing Referrals

The DSL will:

- refer cases of suspected abuse, neglect or exploitation to Children's Social Care as required and support staff who make referrals;
- refer cases to the Channel programme where there are concerns that a person may be susceptible to radicalisation, and support staff who make referrals;
- refer cases to the Disclosure and Barring Service where a person is dismissed or removed from regulated activity because they have harmed a child or pose a risk of harm, where the relevant referral criteria are met;
- refer cases to the Police where a crime may have been committed; and
- seek advice from, and make referrals to, other safeguarding or specialist agencies where appropriate.

The DSL maintains oversight of referrals and ensures that safeguarding responsibility is not considered discharged simply because another agency has become involved.

Working with Others

The DSL will:

- act as a source of safeguarding advice, support and expertise for staff;
- work closely with the Principal and relevant senior leaders on safeguarding and child protection matters;
- chair the College's multidisciplinary safeguarding forum, NEST (Notice Early, Safeguard and Track);
- work with Deputy DSLs, Boarding, Nursing, Counselling, Pastoral and Student Services colleagues to develop a holistic understanding of students' needs;
- liaise with Children's Social Care, the Police, health professionals, the Local Authority Designated Officer (LADO), the Oxfordshire Safeguarding Children Partnership and other relevant agencies;
- take part in strategy discussions, inter-agency meetings and safeguarding assessments, or support appropriately trained colleagues to do so;
- contribute to Child Protection Conferences, Core Groups, Family Help arrangements and other multi-agency safeguarding processes where required;
- promote appropriate information sharing between the College and safeguarding partners;
- understand the College's role within local safeguarding arrangements and contribute appropriately to multi-agency working; and
- ensure that safeguarding support remains coordinated where students are receiving support from external agencies.

Information Sharing and Safeguarding Records

The DSL has overall responsibility for ensuring that safeguarding and child protection information is appropriately recorded, stored, shared and transferred.

The DSL will:

- maintain oversight of safeguarding records held on CPOMS;
- ensure records are clear, accurate, timely and include decisions, actions, outcomes and the rationale for safeguarding decisions;
- ensure information is shared appropriately with staff and external professionals on a need-to-know basis;
- ensure that concerns about data protection or confidentiality do not prevent necessary safeguarding information from being shared;
- ensure safeguarding information is considered collectively so that patterns, cumulative concerns and emerging vulnerabilities can be identified;
- ensure safeguarding records are transferred securely and promptly when a child moves to another education provider;
- ensure confirmation of receipt is obtained when safeguarding records are transferred; and
- consider whether additional information should be shared separately with a new education provider where this would support the child's safety or welfare.

Raising Awareness

The DSL will:

- ensure that the College's safeguarding arrangements are understood and implemented consistently;
- ensure staff know how to identify, record and report safeguarding concerns;
- promote awareness of emerging safeguarding risks and developments in statutory guidance;
- ensure safeguarding remains visible through induction, training, staff briefings and regular safeguarding communications;
- support students to understand how and where they can seek help;
- promote effective safeguarding partnerships with parents and Educational Guardians where appropriate;
- ensure the Safeguarding and Child Protection Policy is reviewed at least annually and updated whenever necessary; and
- contribute to the College's safeguarding quality assurance, governance reporting and continuous improvement arrangements.

Training, Knowledge and Skills

The DSL and Deputy DSLs undertake safeguarding and child protection training appropriate to their role, refreshed at least every two years, together with regular updates to maintain the knowledge and skills required to fulfil their responsibilities effectively.

The DSL maintains a strong working knowledge of:

- relevant safeguarding legislation and statutory guidance, including Keeping Children Safe in Education and Working Together to Safeguard Children;
- local safeguarding arrangements, thresholds and referral pathways;
- Family Help and statutory assessment processes;
- child protection conferences, reviews and other multi-agency safeguarding processes;
- the impact of abuse, neglect, exploitation and trauma on children's development, behaviour, mental health and education;
- the additional vulnerabilities and barriers experienced by some children;
- child-on-child abuse, harmful sexual behaviour and sexual violence and harassment;
- child criminal exploitation and child sexual exploitation;
- domestic abuse;
- serious violence;
- radicalisation and the Prevent Duty;
- online safety, emerging technologies and technology-enabled harm;
- the College's filtering and monitoring systems and processes;
- attendance, children missing education and missing students as potential safeguarding indicators;
- the particular safeguarding considerations associated with international students, boarding and living

- away from home;
- information sharing, confidentiality and safeguarding record keeping; and
- the importance of listening to children and understanding their lived experience.

The DSL will also maintain appropriate knowledge of local safeguarding priorities and emerging risks affecting the College community.

Providing Support to Staff

The DSL recognises that safeguarding can involve complex and difficult professional decisions.

The DSL will:

- provide advice and support to staff responding to safeguarding concerns;
- help staff understand when and how to make safeguarding referrals;
- support staff involved in safeguarding and child protection processes;
- encourage professional curiosity and respectful challenge;
- promote confidence in raising concerns, including where staff disagree with safeguarding decisions;
- ensure safeguarding learning is shared appropriately across the College; and
- contribute to a culture in which safeguarding is understood to be everyone's responsibility.

Where appropriate, the DSL will ensure that staff involved in distressing or complex safeguarding situations have access to appropriate professional support.

Understanding the Views of Children

The DSL will ensure that safeguarding practice remains child-centred and informed by children's wishes, feelings and lived experiences.

The DSL will:

- ensure students are given opportunities to express their views and are listened to;
- take account of students' wishes and feelings when determining safeguarding action, while recognising that safeguarding decisions must ultimately be based upon their best interests and safety;
- recognise that children may not feel ready or know how to disclose abuse, neglect or exploitation;
- recognise that communication, cultural, linguistic, disability-related or other barriers may affect a student's ability or willingness to seek help;
- ensure students understand what action is being taken and why, where it is appropriate and safe to do so; and
- promote a safeguarding culture in which students know that concerns will be taken seriously and that help is available.

Holding and Sharing Information

The DSL understands the importance of information sharing in protecting children and promoting their welfare.

The DSL will ensure that they:

- understand what information the College holds about children who may be at risk;
- understand how safeguarding information is stored and accessed;
- know which staff and external professionals need access to relevant information;
- understand when information can and should be shared without consent;
- maintain appropriate confidentiality while ensuring that this never becomes a barrier to protecting a child; and
- ensure that safeguarding information is available to appropriately trained colleagues where necessary to provide continuity of safeguarding support.

Strategic Safeguarding Leadership

In addition to the responsibilities set out in Keeping Children Safe in Education, the DSL provides strategic safeguarding leadership across Oxford International College.

This includes:

- identifying patterns, trends and emerging safeguarding risks;
- using safeguarding, attendance, boarding, welfare and other relevant information to inform risk assessment and decision-making;
- using NEST to support multidisciplinary review, coordinated intervention and ongoing monitoring;

- evaluating the effectiveness of safeguarding systems and interventions;
- contributing to safeguarding audits and quality assurance;
- reporting appropriately to the Principal, Senior Leadership Team and Governing Body;
- advising leaders and governors on safeguarding developments, risks and priorities;
- ensuring learning from safeguarding cases, reviews, complaints, low-level concerns, inspection and external scrutiny informs future practice; and
- promoting a culture of vigilance, professional curiosity, openness, challenge and continuous improvement.

The DSL's role extends beyond responding to individual safeguarding concerns. It is to provide leadership that ensures safeguarding remains embedded within the culture, systems and everyday practice of Oxford International College.

APPENDIX B – SAFEGUARDING DEFINITIONS AND INDICATORS

The following safeguarding definitions and indicators are reproduced from *Keeping Children Safe in Education 2026, Part One* and should be read alongside the safeguarding risks and College arrangements set out in Chapter 10 of this policy.

Safeguarding definition (KCSIE 2026, p. 8)

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing the impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- and taking action to enable all children to have the best outcomes.

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

Indicators of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing, causing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child

in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Neglect: 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. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

APPENDIX C: IMPORTANT ADDITIONAL INFORMATION

Appendix C provides additional information about specific safeguarding issues which staff may encounter. It should be read alongside *Keeping Children Safe in Education 2026*.

Staff are not expected to become experts in individual safeguarding issues. They are expected to remain alert to possible indicators of harm, exercise professional curiosity and report concerns promptly to the Designated Safeguarding Lead (DSL) or a Deputy DSL.

Online Child-on-Child Abuse

Child-on-child abuse may occur wholly or partly online.

This may include:

- cyberbullying;
- sexual harassment;
- coercive or threatening messages;
- sharing intimate images;
- image-based abuse;
- AI-generated sexual imagery;
- impersonation;
- abusive group chats;
- harassment through social media;
- exclusion or humiliation online; and
- encouraging or inciting harmful behaviour.

Online incidents will be treated with the same seriousness as incidents occurring face-to-face.

Initiation and Hazing

Initiation or hazing-type behaviour may involve humiliation, intimidation, coercion, physical harm or other abusive practices used to initiate someone into a group.

Such behaviour will not be regarded as harmless tradition, bonding or part of boarding life.

Concerns involving initiation or hazing will be treated as potential child-on-child abuse.

Upskirting and Other Voyeuristic Behaviour

Upskirting involves taking an image underneath a person's clothing without their consent with the intention of viewing their genitals or buttocks, whether for sexual gratification or to cause humiliation, distress or alarm.

It is a criminal offence.

Other forms of covert sexualised recording or image-taking may also constitute safeguarding concerns or criminal behaviour.

Any such concern must be reported immediately to the DSL or Deputy DSL.

Teenage Relationship Abuse

Abuse may occur within intimate relationships between young people.

It may include physical, emotional, sexual, psychological or controlling behaviour, coercion, threats, harassment, digital abuse or financial control.

The College recognises that young people may experience significant abuse even where their relationship does not meet the statutory definition of domestic abuse.

All concerns about abusive relationships between students will be treated as safeguarding matters.

Consent

Consent means having the freedom and capacity to choose.

Consent must be:

- freely given;
- specific to the activity concerned;
- capable of being withdrawn at any time; and
- given by a person who has the capacity to make that choice.

Consent to one form of sexual activity does not constitute consent to another.

Consent on one occasion does not imply consent on another occasion.

A child under the age of 13 cannot legally consent to sexual activity. The legal age of consent to sexual activity is 16.

Differences in age, maturity, vulnerability, coercion, intoxication, fear, pressure or power may all affect a person's freedom or capacity to consent.

Recognising a Continuum of Behaviour

Behaviour between children exists on a continuum from developmentally expected behaviour through to inappropriate, problematic, abusive and violent behaviour.

When assessing behaviour, the DSL will consider factors including:

- the ages and developmental stages of those involved;
- the nature and frequency of the behaviour;
- whether behaviour is repeated or escalating;
- the context in which it occurred;
- the wishes and feelings of the child who experienced the behaviour;
- whether there was coercion, intimidation, planning or secrecy;
- any power imbalance;
- differences in age, maturity, status or vulnerability;
- whether the behaviour was consensual;
- whether prejudice or discrimination was involved;
- whether weapons, threats or serious violence were involved;
- whether the behaviour occurred online or involved digital material;
- previous concerns or patterns of behaviour;
- the wider peer or boarding context; and
- the risk of further harm.

The College recognises the importance of early intervention. Behaviour that is initially inappropriate or concerning may escalate if it is not identified and addressed.

What Staff Must Do

All staff have an important role in preventing, recognising and responding to child-on-child abuse.

Staff must:

- challenge inappropriate and abusive behaviour;
- never dismiss concerns as banter or normal adolescent behaviour;
- listen carefully and take reports seriously;
- reassure the student that they have done the right thing by speaking;
- avoid making the student feel responsible or ashamed;
- avoid asking leading or investigative questions;
- make an accurate factual record;
- report the concern immediately to the DSL or Deputy DSL; and
- take immediate action to protect a student where there is an immediate risk of harm.

Staff must not attempt to investigate allegations themselves.

KCSIE 2026 emphasises that children may communicate abuse indirectly through behaviour or changes in presentation and that staff should act on concerns rather than wait for a verbal disclosure.

Responding to a Report

The DSL or Deputy DSL will take the lead in assessing and managing reports of child-on-child abuse.

Where possible and appropriate, particularly in cases involving sexual harassment, harmful sexual behaviour or sexual violence, reports should be managed with two members of staff present, preferably including the DSL or Deputy DSL.

The response will be child-centred and proportionate.

The DSL will consider:

- the immediate safety of all students involved;
- whether emergency action is necessary;
- the wishes and feelings of the student who has experienced harm;
- the nature and seriousness of the allegation;
- age and developmental stage;
- power imbalances;
- previous concerns;
- contextual safeguarding factors;
- whether a crime may have been committed;
- whether Children's Social Care or the Police should be involved;
- the needs of the student alleged to have caused harm;
- risks to other students;
- boarding and accommodation implications; and
- whether a risk assessment or safety plan is required.

All decisions, actions and the rationale for those decisions will be recorded on CPOMS.

Referral and External Agencies

Where a child is suffering or is likely to suffer significant harm, a referral will be made to Children's Social Care without delay.

Where a crime may have been committed, the Police will be involved as appropriate.

The College will cooperate with statutory agencies and will ensure that its own actions do not prejudice a Police or Children's Social Care investigation.

Where statutory thresholds are not met, the College will consider whether Family Help, specialist services, pastoral intervention or other support is appropriate.

Where the DSL believes that a statutory agency response does not adequately address the safeguarding risk, professional challenge and escalation procedures will be used.

Informing Parents and Educational Guardians

Parents or carers will normally be informed about incidents of child-on-child abuse where it is appropriate and safe to do so.

They will not be informed where doing so may place a child at increased risk, prejudice an investigation or otherwise be contrary to the child's welfare.

For international students, the College will also consider the appropriate involvement of Educational Guardians, taking account of confidentiality, the student's circumstances and safeguarding risk.

Where Police or Children's Social Care are involved, the College will take account of their advice before contacting parents or others.

Risk Assessment and Safety Planning

Following a report of child-on-child abuse, the DSL will consider whether a written risk assessment or safety plan is required.

This may address:

- contact between students;
- lessons and academic arrangements;
- boarding accommodation;
- communal spaces;
- social activities;
- travel;
- online contact;
- supervision;
- trusted adults;
- counselling, health or pastoral support; and
- arrangements for review.

Risk assessments are dynamic and will be reviewed whenever circumstances change.

The aim is to protect students while avoiding unnecessary disruption to their education and daily life wherever this can be achieved safely.

Supporting the Student Who Has Experienced Harm

Support will be individualised according to the student's needs and wishes.

This may include:

- a trusted adult;
- counselling;
- nursing or health support;
- pastoral support;
- adjustments to academic or boarding arrangements;
- additional supervision or safety planning;

- external specialist services; and
- support from parents or Educational Guardians where appropriate.

The student's needs and wishes will remain central to decision-making, alongside the need to keep them safe.

Where possible, the College will support the student to continue their normal routines and education and will seek to ensure that they do not experience the consequences of safeguarding measures as punishment.

KCSIE 2026 emphasises that support should be proportionate, regularly reviewed and aimed at making the child's day-to-day experience as normal and safe as possible.

Supporting the Student Who Has Displayed Harmful Behaviour

A child who has displayed harmful behaviour may also require safeguarding support.

The College will seek to understand:

- what has contributed to the behaviour;
- whether the child has experienced abuse, trauma or exploitation;
- whether there are wider safeguarding concerns;
- the child's developmental understanding;
- whether specialist assessment or intervention is required; and
- what measures are necessary to prevent further harm.

Support may include pastoral intervention, counselling, Family Help, specialist services, behaviour support or work with external agencies.

Providing safeguarding support does not prevent the College from taking appropriate disciplinary action.

Safeguarding and disciplinary processes may operate alongside one another, provided action does not prejudice a criminal or statutory safeguarding investigation.

Wider Impact and the College Community

An incident of child-on-child abuse may affect students beyond those directly involved.

The College will consider:

- the impact on friendship groups;
- boarding communities;
- classmates or year groups;
- students who witnessed an incident;
- rumours or online discussion;
- retaliation or harassment;
- whether other students may also have experienced harm; and
- whether wider education or preventative work is required.

Where appropriate, the College may respond through Life Skills, assemblies, tutor work, boarding programmes or other preventative education without identifying individual students or breaching confidentiality.

Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for them. It may be committed by parents or other family members, people known to the child or strangers.

Other community safety concerns may also place children at risk, including exploitation, violence, harassment or unsafe locations within the local community.

Where concerns arise about the possible abduction of a student, their whereabouts or their immediate safety, staff must contact the DSL or Deputy DSL without delay. Where there is an immediate risk, the Police should be contacted.

For international students, particular consideration may need to be given to travel arrangements, family circumstances, immigration status, Educational Guardians and the possibility of a student being taken or travelling outside the United Kingdom.

Children and the Court System

Children may be required to participate in criminal or family court proceedings, including as victims or witnesses or as a result of family separation and child arrangement proceedings.

The College recognises that involvement in court proceedings can be stressful and may affect a student's wellbeing, attendance, behaviour or academic engagement.

Where the College is aware that a student is involved in court proceedings, appropriate pastoral and safeguarding support will be considered.

Children with a Parent or Family Member in Prison

Children with a parent or close family member in prison may experience additional challenges, including stigma, isolation, financial difficulties, disrupted family relationships and emotional or mental health difficulties.

Staff should remain sensitive to the possible impact upon the student and share welfare or safeguarding concerns in accordance with normal College procedures.

Appropriate pastoral or external support will be considered according to the individual student's needs.

Domestic Abuse

Domestic abuse can include physical, sexual, emotional, psychological or economic abuse, as well as coercive or controlling behaviour.

Children can be victims of domestic abuse in their own right where they see, hear or experience the effects of domestic abuse.

Experiencing domestic abuse can have a significant and long-lasting impact upon a child's emotional wellbeing, behaviour, relationships, attendance, educational engagement and sense of safety.

Young people may also experience abuse within their own intimate relationships. Concerns involving teenage relationships will be managed as safeguarding concerns irrespective of whether the relationship falls within the statutory definition of domestic abuse.

Operation Encompass

Operation Encompass is the statutory information-sharing arrangement through which Police notify a child's educational establishment following attendance at a domestic abuse incident in the child's home.

The arrangements apply to children connected with the household, whether or not they were present when the incident occurred.

Operation Encompass information is received by the DSL or another appropriately trained member of the safeguarding team.

On receipt of a notification, the College will:

- record the information appropriately on CPOMS;
- consider it alongside existing safeguarding, pastoral, attendance, boarding, health and welfare information;
- assess what immediate or ongoing support the student may require;
- share information only with staff who need to know in order to safeguard or support the student;
- consider whether further safeguarding action or referral is required; and
- monitor the student's welfare and the effectiveness of support provided.

Where appropriate, information may be considered through NEST (Notice Early, Safeguard and Track) to ensure that the student's circumstances are understood holistically and support is coordinated.

An Operation Encompass notification does not replace normal safeguarding procedures. Where information indicates that a child may be at risk of harm, the College will take appropriate safeguarding action.

Modern Slavery and the National Referral Mechanism

Modern slavery includes human trafficking, slavery, servitude and forced or compulsory labour.

Children may be exploited through:

- sexual exploitation;
- forced labour;
- domestic servitude;
- criminal exploitation;
- trafficking; or
- other forms of coercion and exploitation.

International students may have particular vulnerabilities because of travel arrangements, immigration circumstances, language or cultural barriers, dependence upon adults or unfamiliarity with UK systems.

Any concern that a student may be a victim of trafficking or modern slavery must be reported immediately to the DSL or Deputy DSL.

The DSL will consider appropriate referral to Children's Social Care, the Police and/or the National Referral Mechanism as appropriate.

Preventing Radicalisation

Protecting children from radicalisation forms part of the College's wider safeguarding responsibilities.

Radicalisation is the process through which a person comes to support terrorism or extremist ideologies associated with terrorist groups.

The College fulfils its responsibilities under the Prevent Duty through risk assessment, partnership working, staff training, appropriate IT arrangements and education.

Staff should report concerns that a student may be susceptible to radicalisation to the DSL, Deputy DSL or College Prevent Lead.

The College maintains a Prevent Risk Assessment reflecting the characteristics of the College community and relevant local, national and international risks.

Channel

Channel is a multi-agency programme which provides support to people identified as susceptible to being drawn into terrorism.

Where concerns arise, the DSL or Prevent Lead will consider whether advice or referral to Prevent or Channel is appropriate.

Participation in Channel support is voluntary.

Where a student receiving Channel support transfers to another education provider, consideration will be given to sharing relevant safeguarding information securely to ensure continuity of support.

Sexual Violence, Sexual Harassment and Harmful Sexual Behaviour

Sexual violence, sexual harassment and harmful sexual behaviour can occur between children of any age and may take place face-to-face or online.

Such behaviour is never acceptable and will not be dismissed as banter, joking, part of growing up or normal adolescent behaviour.

The College recognises that harmful sexual behaviour exists on a continuum and that behaviour must be considered in the context of the child's age and stage of development.

All concerns will be taken seriously and managed in accordance with Part Five of *Keeping Children Safe in Education 2026*.

Honour-Based Abuse

So-called honour-based abuse encompasses incidents or crimes committed to protect or defend the perceived honour of a family or community.

It may include Female Genital Mutilation (FGM), forced marriage and other harmful practices.

Honour-based abuse may involve multiple perpetrators and wider family or community pressure. All forms of honour-based abuse are safeguarding concerns and must be reported immediately.

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises procedures involving the partial or total removal of external female genitalia or other injury to the female genital organs for non-medical reasons.

FGM is illegal in the United Kingdom and is a form of child abuse.

Staff must remain alert to indications that a girl may be at risk of FGM or may already have undergone FGM.

Mandatory Reporting Duty

Teachers have a statutory duty to report directly to the Police where, in the course of their professional duties, they discover that FGM appears to have been carried out on a girl under the age of 18.

The mandatory reporting duty does not replace normal safeguarding responsibilities. The teacher should also inform the DSL unless there is a good reason not to do so.

Suspensions that a child may be **at risk** of FGM must be reported immediately through the College's normal safeguarding procedures.

Staff must never examine a student to establish whether FGM has occurred.

Forced Marriage

A forced marriage is a marriage in which one or both people do not consent, or cannot consent, to the marriage and pressure, coercion or abuse is used to cause the marriage to take place.

Forcing someone into marriage is a criminal offence.

Staff should be alert to possible indicators including unexplained absence, concern about overseas travel, sudden restrictions upon a student's freedom, family pressure, anxiety about holidays or travel, or a student indicating that marriage arrangements are being made against their wishes.

Concerns about forced marriage must be reported immediately to the DSL or Deputy DSL.

Staff must not approach family members or attempt mediation where forced marriage is suspected, as doing so may increase the risk to the student.

Private Fostering

A private fostering arrangement occurs where a child under the age of 16, or under 18 if disabled, is cared for and accommodated for 28 days or more by someone who is not:

- their parent;
- a person with parental responsibility; or
- a close relative.

A close relative includes a grandparent, brother, sister, uncle or aunt, whether of full blood, half blood or by marriage or civil partnership, and a step-parent.

Private fostering is particularly relevant within an international education context.

An Educational Guardian is not necessarily a close relative for the purposes of private fostering legislation. An arrangement under which a child stays in the home of an Educational Guardian, host family, family friend or another adult may therefore constitute private fostering where the relevant conditions are met.

The College will remain vigilant to potential private fostering arrangements, including where a student:

- stays with an Educational Guardian for an extended period;
- lives with a family friend or other adult while studying at the College;
- remains with another family during an extended College holiday; or
- moves from boarding into a private household.

Where any member of staff becomes aware of an arrangement which may constitute private fostering, they must inform the DSL or Deputy DSL.

The DSL will establish the circumstances and ensure that the relevant Local Authority is notified where required.

Staff should not attempt to determine for themselves whether an arrangement legally constitutes private fostering. Where there is uncertainty, advice will be sought from the relevant Local Authority.

Any associated safeguarding concerns will be managed in accordance with the College's normal safeguarding procedures.

Sexual Harassment, Sexual Violence and Harmful Sexual Behaviour

Harmful sexual behaviour (HSB), sexual harassment and sexual violence can occur between children of any age and sex and may involve individuals or groups.

They can occur online or face-to-face and may overlap.

Harmful sexual behaviour exists on a continuum. Behaviour may range from developmentally inappropriate or problematic sexual behaviour through to abusive and violent behaviour.

The College recognises the importance of early identification and intervention, particularly where behaviours may be escalating.

Sexual harassment may include unwanted sexual comments, sexualised jokes, sexualised name-calling, sexual gestures, intrusive questions, unwanted touching, sexualised online behaviour or other unwanted conduct of a sexual nature.

Sexual violence includes criminal sexual offences such as rape, assault by penetration, sexual assault and causing someone to engage in sexual activity without consent.

The College follows **Part Five of Keeping Children Safe in Education 2026** when responding to reports of harmful sexual behaviour, sexual harassment and sexual violence. KCSIE 2026 places particular emphasis on the continuum between these behaviours, early identification and the need to challenge misogyny and other attitudes that can contribute to their escalation.

Misogyny, Misandry and Harmful Attitudes

The College recognises that discriminatory attitudes and language can contribute to environments in which abuse becomes normalised.

Misogynistic, misandrist, sexist, homophobic or other discriminatory language and behaviour will therefore be challenged.

Misogyny in particular may form part of an escalating continuum of behaviour associated with harmful sexual behaviour, sexual harassment and sexual violence.

Staff should not wait for behaviour to reach a threshold of serious abuse before challenging inappropriate attitudes or conduct.

Sharing Nude and Semi-Nude Images and Videos

The making or sharing of nude or semi-nude images or videos by children under the age of 18 is a safeguarding matter.

This includes:

- images created by the child themselves;
- images taken or created by another person;
- consensual sharing;
- non-consensual sharing;
- images that have been digitally altered; and
- images wholly or partly generated using artificial intelligence, including deepfakes or “deep nudes”.

All incidents involving the sharing of nude or semi-nude images require a safeguarding response, whether the original sharing appears to have been consensual or non-consensual.

Staff must report concerns immediately to the DSL or Deputy DSL and should **not routinely view, copy, forward, save or ask a student to forward an image**.

The DSL will manage the incident in accordance with KCSIE, relevant UKCIS guidance and the College's safeguarding procedures.

Appendix D – HOW TO WRITE A CPOMS ENTRY

Structuring your report:

1. State what the reason for the report is, e.g.
**INCIDENT
FOR INFORMATION ONLY
UPDATE**
2. Add overview of incident /event
 - Facts
 - Full names
3. If you have actioned, indicate what you have done under the heading:
ACTION TAKEN
4. You must indicate what action you want to happen, and by whom. List this under:
ACTION

Also!

1. Use the calendar box for exact time and date of incident.
2. Assign to a member of staff.
3. Alert staff members if not automatically alerted.
4. Add any linked students if relevant .
5. Attach any relevant documents.

Remember!

- Record actions and facts.
- Give full names, the person's role in brackets.
- No initials or acronyms

APPENDIX E: RELATED POLICIES AND PROCEDURES

This Safeguarding and Child Protection Policy should be read alongside other relevant Oxford International College policies, procedures and guidance.

These include:

- Acceptable Use of IT – Student Policy
- Acceptable Use of IT – Staff Policy
- Allegations Against Staff and Volunteers Policy
- Attendance Policy
- Boarding Policies and Procedures
- Staff Code of Conduct
- Independent Living Policy
- Low-Level Concerns Policy
- Missing Students Policy
- Online Safety Policy
- Prevent Policy and Prevent Risk Assessment
- Preventing Bullying / Anti-Bullying Policy
- Promoting Positive Behaviour Policy
- PSHE / Life Skills Policy
- Relationships and Sex Education (RSE) Policy
- Safer Recruitment and Selection Policy
- Special Educational Needs and Disabilities (SEND) Policy
- Whistleblowing Policy

Relevant boarding, contextual safeguarding and other operational risk assessments should also be read alongside this policy where appropriate.

The College's safeguarding arrangements operate collectively. Where policies overlap, safeguarding and the welfare of students remain the paramount consideration.