



**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:	NAE Head of Safeguarding
CONSULTATION WITH:	Designated Safeguarding Lead, OSCB
REVIEW DATE:	August 2024
FUTURE REVIEW:	August 2025

### The Three Pillars

The three pillars of Oxford International College (OIC) are:

- Academic Excellence
- Personal Development
- Career and University Pathways

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## KEY CONTACT DETAILS

Key Personnel	Name(s)	Contact details
Designated Safeguarding Lead (DSL)	Severine Collins	07900 091 649 <a href="mailto:Severine.collins@oxcoll.com">Severine.collins@oxcoll.com</a>
Deputy DSL(s)	Marianne Thompson-Hill  Kieran Jones  Ben Holman	07770775387 <a href="mailto:marianne@oxcoll.com">marianne@oxcoll.com</a>  07553438692 <a href="mailto:Kieran.jones@oxcoll.com">Kieran.jones@oxcoll.com</a>  07379119941 <a href="mailto:Ben.holman@oxcoll.com">Ben.holman@oxcoll.com</a>
College's named 'Prevent' lead	Jason Brooks	<a href="mailto:Jason.brooks@oxcoll.com">Jason.brooks@oxcoll.com</a>
Nominated Safeguarding Governor	Graham Witte	Graham.witte@nordanglia.com
Chair of Governors	Richard Davies	<a href="mailto:Richard.davies@nordanglia.com">Richard.davies@nordanglia.com</a>
Education Safeguarding Advisory Team/ Local Authority Designated Officers (LADOs)	Jo Lloyd Sandra Barratt Lorna Todd Becky Langstone Sophie Kendall	01865 810603 <a href="mailto:Lado.safeguardingchildren@oxfordshire.gov.uk">Lado.safeguardingchildren@oxfordshire.gov.uk</a> <a href="mailto:ESAT.safeguardingchildren@oxfordshire.gov.uk">ESAT.safeguardingchildren@oxfordshire.gov.uk</a>
Locality Community Support Service (LCSS) worker	Nicola Francis	07785 453281 <a href="mailto:nicola.francis@oxfordshire.gov.uk">nicola.francis@oxfordshire.gov.uk</a>
Multi agency Safeguarding Hub (MASH)		0345 050 7666
Out of hours Emergency Duty Team (EDT)		0800 833408
Police		101 or in emergencies 999



Date agreed and ratified by Governing Body August 2024

The policy must be reviewed and updated at least annually and/or following any updates to national and local guidance and procedures. The policy is consistent with Keeping Children Safe in Education 2024.

## **1. INTRODUCTION**

Oxford International College recognises its responsibility for safeguarding and child protection. As Oxford International College (OIC) is a boarding College, the term “College” refers to academic as well as boarding communities within OIC.

Oxford International College’s unique education philosophy is underpinned by our belief and commitment that all our students will be supported to realise their full potential by learning and thriving in the safest possible environment. Our students are empowered to make decisions for themselves and are supported in this by learning through specific elements of the curriculum, aimed at enabling students to be able to keep themselves safe (e.g. through personal, social and health education (Life Skills), Wellness programmes or similar).

Oxford International College recognises that having appropriate safeguarding and child protection procedures does not mean that any risk to our students is eliminated. Rather, we expect all staff and volunteers in our College, and any contractors or partner agency staff used by our College, to recognise when a student may be at risk of, or is actually being harmed, and do all they can to reduce further risk of further harm.

We recognise that every member of staff plays a particularly important role in protecting our students. We are both a place of education and home to students for a large part of each year. As such we are in the best position to identify concerns early and provide help for students or prevent concerns from escalating. Consequently, Oxford International College accepts and adheres to the following basic principles:

- A child’s welfare is paramount, and each student has the right to be protected from harm and exploitation and to have their welfare safeguarded irrespective of race, religion, ability, gender, or culture.
- All students need to be safe and feel safe in the College and in boarding.
- Every student is entitled to a rich and broad curriculum that equips them to keep themselves safe and we will provide a world-class, safe and happy environment to enable students to thrive and learn.
- Every adult in the College or boarding must have a demonstrable commitment to protecting the students with/for whom we work.
- We work in partnership with parents/carers and/or other external professionals to ensure the protection of students.
- Our guiding principle throughout is ‘the best interests of the students’.
- All students have the same equal rights to protection, but we recognise that we need to do more for some students because of their special educational needs, disability, gender, religion, or sexual orientation.

## **1. AIMS AND OBJECTIVES**

- 1.1 Everyone who comes into contact with children and families has a role to play in ensuring children and young people are safe from abuse, neglect, exploitation and harm. It is essential that everybody working in OIC understands their safeguarding responsibilities. Our College is committed to safeguarding children and aims to create a culture of vigilance. All staff should make sure that any decisions made are in the best interests of the child.
- 1.2 The governing body will ensure that our College will safeguard and promote the welfare of students and work together with agencies to ensure that our College has adequate arrangements to identify, assess and support those children who are suffering or where significant harm is suggested.  
[What to do if you think a child is at risk of abuse or neglect - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](https://www.oscb.org.uk)
- 1.3 This policy provides the basis for good practice within the College for our Safeguarding work. It should be read in conjunction with the Oxfordshire Safeguarding Children's Board Safeguarding Policies and Procedures, plus the safeguarding appendix document. These are in keeping with relevant national procedures and reflect what the partnership considers to be safe and professional practice in this context.
- 1.4 This policy applies to all members of staff in our College, including all permanent, temporary and support staff, governors, volunteers, contractors and external service or activity providers.

## **2. THE LEGAL FRAMEWORK**

- 2.1 This policy and the accompanying procedure have been developed in accordance with the following statutory guidance and local safeguarding procedures:

- *Working Together to Safeguard Children: A Guide to Inter-Agency Working to Safeguard and Promote the Welfare of Children, July 2023:*  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

*(Working together 2023 defines safeguarding as: activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online).*

- *Keeping Children Safe in Education: Statutory Guidance for Colleges and Colleges, September 2024*  
[www.gov.uk/government/publications/keeping-children-safe-in-education--2](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2)

## **3. ROLES AND RESPONSIBILITIES**

- 3.1 The governing body and proprietors:
  - Are collectively responsible for ensuring that safeguarding arrangements are fully embedded within the College's ethos and reflected in the College's day-to-day practice. The governing body will hold all College leaders to account for ensuring that appropriate safeguarding policy and practice is in place and understanding how effective these procedures are when in operation.

3.2 The Principal/ and senior leadership team in College will:

- Ensure that the College's Safeguarding and Child Protection Policy together with all other relevant policies and procedures, e.g. Allegations and Whistle blowing are implemented across their College and followed by all staff and volunteers.
- Allocate sufficient time and resources to enable the Designated Safeguarding Lead (DSL) and any Deputy Designated Safeguarding Lead to carry out their role effectively.
- Ensure that the culture of the College facilitates concerns being raised and handled sensitively.
- Ensure that any mandatory element of the curriculum is delivered according to regulatory requirements.
- Ensure that all staff have seen and read the updated 2024 version of code of conduct (guidance for safer working practice).
- Ensure that all staff are aware of the policy for dealing with allegations about staff (updated 2024).
- Ensure that safeguarding is addressed through the curriculum.
- Ensure the College site is secure and that unknown individuals are prevented from accessing College sites or students.
- Ensure that the Colleges policy identifies those in College with responsibility for safeguarding i.e. Designated Safeguarding Leads (DSLs) and Deputy Designated Safeguarding Leads (DDSLs).
- Ensure that the College has appropriate staff trained to support the wellbeing of students and has accessed ASIST suicide prevention and wellbeing training.
- Only deploy staff who will have unsupervised contact with children where safe recruitment procedures have been followed.
- Maintain a record of all training undertaken by staff in relation to safeguarding and child protection. This training record should be made available for inspection during any audit and should reflect the timescales for renewal identified in these procedures.

3.3 The governing body and proprietors:

- Are collectively responsible for ensuring that safeguarding arrangements are fully embedded within the College's ethos and reflected in the College's day-to-day practice. The governing body will hold all College leaders to account for ensuring that appropriate safeguarding policy and practice is in place and understanding how effective these procedures are when in operation.

3.4 All Staff:

- Are expected to be familiar with and follow this safeguarding/child protection policy and procedures and all other safeguarding related policies e.g. Code of Conduct, Low-level Concerns etc.
- Be subject to safe recruitment processes and appropriate background checks, including prohibition order checks for any staff member who trained and /or worked in the UK prior to starting at the College/organisation (unless an action plan/risk assessment is in place to ensure the staff member is supervised until all checks are completed, excluding Boarding staff).
- Be aware of and alert to signs and indicators of possible abuse.
- Listen to and take seriously the views and concerns of children.
- Record any concerns and report these to the Designated Safeguarding Lead (DSL).
- Follow the procedures outlined in this and any College specific document when/if concerned

about any child.

- Support students, staff or other adults who have concerns, or who are the subject of concerns, to act appropriately and effectively in instigating or cooperating with any subsequent process of investigation.
- Undertake appropriate child protection/safeguarding, safe recruitment and on-line/cyber safety and wellbeing/suicide prevention training as well as any other appropriate training identified by the College's DSL and or SLT (including refresher training).
- All staff and volunteers need to recognise that if their behaviour inside or outside the workplace breaches the NAE code of conduct and/or the guidance for safe working practice, this may be considered a disciplinary or even criminal matter.

In Oxford International College the Designated Safeguarding Lead is Severine Collins who can be contacted using email: [severine.collins@oxcoll.com](mailto:severine.collins@oxcoll.com) or on phone number

M +44 (0) 7900 091649

T +44 (0) 1865 203988

3.5 All staff who have occasional or supervised contact with children (including staff from partner organisations) will:

- Undergo a safeguarding briefing/induction in relation to their role, understand what is required of them if they have concerns and to whom they should report.
- Provide written confirmation to demonstrate that where appropriate, all partner organisation staff and contractors have been safely recruited with appropriate checks undertaken and that a safeguarding briefing has been provided to these staff, (appropriate to the role and contact they will have with children) before they commence their role on any Oxford International College sites. Where these staff or volunteers are constantly supervised, the recruitment checks may not need to be as rigorous. Still, it is for the Principal/ Designated Safeguarding Lead to assess this risk, not individual members of staff or partner organisations themselves.
- Where partner organisations/contractors do not have their own safeguarding or child protection policy or procedures, Oxford International College will provide a copy of the College's own policy and procedures and ask partner organisations/contractors to read and follow this. These requirements will be part of any contractual arrangement.
- Follow the guidance laid down in these procedures at all times.

3.6 Our College acknowledges the need to treat everyone **equally, with fairness, dignity and respect**. Any discriminatory behaviours are challenged and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents.

3.7 The College and governing body take all reasonable action to limit children's exposure to the risks from the College's IT system and ensure the College has appropriate filters and monitoring systems in place and regularly review their effectiveness in line with national expectations.

#### **4. SUPPORTING CHILDREN**

4.1 Our College will support all students by:

- Ensuring the content of the curriculum includes social and emotional aspects of learning through PSHE, RSE and other curriculum contexts and ensuring that students are taught about safeguarding so that they 'recognise when they are at risk and how to get help when they need it'.
- Ensuring a comprehensive curriculum response to online safety, enabling children and parents to learn about the risks of new technologies and social media and to use these responsibly.



- Encouraging students to talk about feelings and are listened to, providing students with a range of appropriate adults to approach as needed.
- Supporting children to feel safe, develop confidence and independence and increase the development of self-esteem and self-assertiveness while not condoning aggression or bullying.
- Liaising and working together with other support services and those agencies involved in safeguarding children, including domestic abuse, Early Help and preventative services <https://www.gov.uk/government/consultations/domestic-abuse-act-statutory-guidance>
- Considering intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Having a positive behaviour policy that is aimed at supporting vulnerable students in the College. The behaviour policy outlines measures to prevent bullying, including cyber-bullying, prejudice-based and discriminatory bullying.
- Having clear procedures in place for addressing and minimising the risk of child-on-child abuse, including harmful sexual behaviours, sexual violence, and sexual harassment (which could take place on or off-line).
- Acknowledging the importance of 'contextual safeguarding', which considers wider environmental factors in a student's life that may be a threat to their safety and/or welfare.
- Alerting the authority if it is aware of any child being looked after under a Private Fostering arrangement. On admission to College, and at other times, the College will be vigilant in identifying any private fostering arrangement.
- Acknowledging that a child that is looked after (CWCF) or has been previously looked after by the Local Authority potentially remains vulnerable and all staff have the skills, knowledge and understanding to support these children.
- Taking positive action, where it can be shown that it is proportionate, to deal with disadvantages affecting students or students with certain protected characteristics in order to meet their specific need. For example, taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment. This includes making reasonable adjustments for disabled children and young people and those identified as having special educational needs.

## **5. DEALING WITH A CONCERN AND RECORD KEEPING**

5.1 Our College uses CPOMs to share and store information about students where we have safeguarding or welfare concerns. If a member of staff has a concern about a student or if a student tells them they are being abused, exploited or neglected, staff will respond appropriately in the first instance by listening and offering reassurance.

5.2 Staff should also make an entry on CPOMs outlining the following factual record:

- Dates and times of their observations
- Dates and times of any discussions in which they were involved
- Any injuries
- Explanations given by the child / adult
- Any initial action taken
- Any actual words or phrases used by the child
- Any questions the staff member asked (remembering not to ask any leading questions)

The entry on CPOMs will create an alert which will go directly to the DSL and Deputy DSLs.

5.3 Staff should also listen to the wishes and feelings of the child, but not to promise confidence.

5.4 The DSL will consider if there is a requirement for immediate medical intervention, however urgent

medical attention should not be delayed if the DSL or DDSL is not immediately available.

- 5.5 The DSL or DDSL will refer all concerns which reach the threshold set by the local authorities to the local MASH but in the absence of the DSL or DDSL, staff will refer directly to MASH or the police (if appropriate) where there is a significant concern.
- 5.6 The DSL will ensure any decisions and reasons for those decisions will be recorded in writing in CPOMS with clear outcomes documented following any action taken. Our College will discuss any concerns we have with the child's parents. There may be occasions when this is not appropriate and College staff would consult with other agencies prior to involving parents. We will record any decision not to discuss with parents and why in CPOMS.
- 5.7 Safeguarding records are kept for individual children in CPOMS and are maintained separately from all other records relating to the child in the College. Safeguarding records are kept in accordance with General Data Protection Regulations (GDPR) and our own College GDPR policy.
- 5.8 All safeguarding records will be transferred in accordance with GDPR/KCSiE to the child's receiving College/setting within 5 College days. The Principal will be kept informed of any significant concerns by the DSL. Other staff are informed on a need-to-know basis.

## **6. INFORMATION SHARING**

- 6.1 Everyone in OIC must take responsibility for sharing information in order to keep children safe from harm, they must not assume someone else will pass on information.
- 6.2 All staff members have a professional responsibility to share information with other agencies to safeguard students.
- 6.3 All staff members who come into contact with children will be given appropriate training to understand the purpose of information sharing to safeguard and promote children's welfare.
- 6.4 We will ensure that staff members are confident about what they can and should do according to the law, including how to obtain consent to share information and when information can be shared without consent.
- 6.5 Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

## **7. MULTI AGENCY WORKING**

- 7.1 We will develop and promote effective working relationships with other agencies, including agencies providing early help services to children, the police and Children's Social Care.
- 7.2 We will ensure that relevant staff members participate in multi-agency meetings and forums, including child protection conferences and core groups, to consider individual children.
- 7.3 We will participate in Child Safeguarding Practice Reviews (CSPR's), other reviews and file audits as and when required to do so by the Oxfordshire Safeguarding Children's Board. We will ensure that we have a clear process for gathering the evidence required for reviews and audits and embed recommendations into practice and complete required actions within agreed timescales.

## **8. SAFER RECRUITMENT**

- 8.1 Our College is committed to ensuring the development of a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff.
- 8.2 The Governing Body and Leadership Team are responsible for ensuring that the College follows safe recruitment processes outlined within guidance.
- 8.3 The College maintains an accurate up to date Single Central Record (SCR) in line with statutory guidance. This will be monitored and reviewed to ensure compliance by the Governing Body and the College's Leadership Team.
- 8.4 The Governing Body will ensure that at least one of the people who conducts a recruitment interview has completed safer recruitment training.
- 8.5 The College will ensure that contractors and providers are aware of the College's safeguarding policy and procedures and that this will be referred to and followed if an allegation is made regarding a member of their agency. The College will require that employees and volunteers provided by these organisations use the College's procedures to report concerns.
- 8.6 We will seek assurance that employees and volunteers provided by these organisations and working with our children have been subjected to the appropriate level of safeguarding checks in line with *Keeping Children Safe in Education: Statutory Guidance for Colleges and Colleges, 2024*.

*Note: Where written assurances are not provided, access to our students or premises will be refused.*

- 8.7 When we commission services from other organisations, we will ensure that compliance with our policy and procedures is a contractual requirement.
- 8.8 We advise all staff to disclose any reason that may affect their suitability to work with children that could be a transferable risk to their role.

## **9. TRAINING**

- 9.1 All staff in our College are expected to be aware of the signs and symptoms of Abuse and must be able to respond appropriately.
- 9.2 To ensure that all our staff can respond appropriately every adult who is allowed access to students at OIC must undertake the basic safeguarding training course provided through the local safeguarding partnership as a minimum. This training is repeated at least every 3 years. In addition all staff receive an annual update for the College's designated safeguarding lead.
- 9.3 In our College, all staff receive appropriate safeguarding training at induction which is updated at least annually.
- 9.4 Separate training is provided to all new staff on appointment as part of their induction process including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring. This information will be regularly updated.
- 9.5 **Governing bodies** and **proprietors** should ensure that **all** governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in Colleges and Colleges are effective and support

the delivery of a robust whole College approach to safeguarding. Their training should be regularly updated.

- 9.6 We will ensure that staff members provided by other agencies and third parties, e.g. supply teachers and contractors, have received appropriate safeguarding training commensurate with their roles before starting work. They will be given the opportunity to take part in whole-College training if it takes place during their period of work for the College.
- 9.7 The Designated Safeguarding Lead will provide briefings to the College on any changes to safeguarding legislation and procedures and relevant learning from Child Safeguarding Practice Reviews (CSPR's) in line with Working Together 2023. These will occur annually or more frequently when necessary and will include safeguarding and child protection updates such as online safety (for example, via emails, e-bulletins and staff meetings), to provide them with the skills and knowledge to safeguard children effectively.
- 9.8 The College will maintain accurate and up to date records of staff induction and training.

## 10. WHISTLEBLOWING IN A SAFEGUARDING CONTEXT

- 10.1 While our parent organisation Nord Anglia Education has a separate whistleblowing policy, this is a summary that outlines the process when there is a concern that safeguarding issues have not been reported or followed correctly.
- 10.2 This does not replace the whistleblowing policy and should be read in conjunction with the NAE policy.

Whistleblowing is a term that is used when staff want to report a concern involving any adult in the organisation which may prevent them from following the normal reporting systems.

- 10.3 The policy protects staff from being punished for raising concerns.
- 10.4 The Principal is responsible for all staff. If you are concerned that any member of staff within the College is not following safeguarding processes or is behaving in a way that is placing children at risk you should, in the first place, make the Principal aware.
- 10.5 If your concern is about the Principal, you should raise this with our Chair of Governors and/or the global head of safeguarding. These colleagues will always consult with the LADO.
- 10.6 If you would prefer to raise your concerns outside of the College, then you are able to contact the NSPCC whistleblowing line on 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk) for national organisations or make contact with Oxfordshire County Council.
- 10.7 If you believe that a member of the College staff is harming a child (an allegation) and this has been reported to the Principal and no / insufficient action has been taken, or the member of staff you have concerns about is the Principal, then you are able to contact the Designated Officers team (LADO) on 01865 810603 or email [lado.safeguardingchildren@oxfordshire.gov.uk](mailto:lado.safeguardingchildren@oxfordshire.gov.uk)
- 10.8 If you believe that a child is being abused by individuals outside the College, you can make a referral to Children's Social Care by calling the MASH on **0345 050 7666** or **0800 833 408** (outside of office hours).

Further guidance for staff can be accessed through: [Child abuse concerns: guide for practitioners -](#)

[GOV.UK \(www.gov.uk\)](http://www.gov.uk) and through the NSPCC website [What is Child Abuse & How to Keep Your Child Protected | NSPCC](#)

## **11. SITE SECURITY**

- 11.1.1 All staff members have a responsibility to ensure our buildings and grounds are safe, this includes ensuring the safety of any visitors into College.
- 11.2 The College will not accept the behaviour of any individual, parent or anyone else, that threatens College security or leads others, child or adult, to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the College site.
- 11.3 No unauthorised adult is permitted access to any Building used by OIC and or/our students. All visitors will be asked to show identity and sign into any building and where necessary will be escorted around the premises.

## **12. QUALITY ASSURANCE**

- 12.1 We will ensure that systems are in place to monitor the implementation of and compliance with this policy and accompanying procedures. To do this the governing body will take an overview of compliance and we will work with external partners, such as colleagues from Oxfordshire ESAT team to provide an extra level of objective oversight.
- 12.2 The College's senior management and the governing body will ensure that action is taken to remedy any deficiencies and weaknesses identified in child protection arrangements without delay.

## **13. POLICY REVIEW**

- 13.1.1 This policy and the procedures will be reviewed every academic year. All other linked policies will be reviewed in line with the policy review cycle.
- 13.2 The Designated Safeguarding Lead will ensure that staff members, including volunteers and sessional workers are made aware of any amendments to policies and procedures.
- 13.3 Additional updates to the safeguarding policy and appendix will take place when needed.

## **APPENDIX A: THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD**

### **Managing referrals:**

- Refer cases to MASH and the police, where appropriate, in a timely manner avoiding any delay that could place the child at increased risk
- Identify any safeguarding issues relating to individual children, especially ongoing enquiries under section 47 of the Children Act 1989.
- Refer to the Oxfordshire Threshold of needs to assist with decision making - [Oxfordshire- Threshold-of-Needs-2021.pdf \(oscb.org.uk\)](#)
- Act as a source of support, advice and expertise to staff members on matters of child protection

and safeguarding, including contextual safeguarding.

- Have responsibility to ensure there is at least one key adult for 'Operation Encompass'\* and a point of contact for Child Exploitation. \*Guiding principles of the scheme are here <https://www.operationencompass.org/College-participation> . An annual information letter must be sent to parents.
- To ensure that the Local Authority are notified if children are persistently absent or missing from education

#### **Record keeping:**

- Keep written (or online) records of safeguarding and welfare concerns and ensure a stand-alone file is created as necessary for children with safeguarding concerns
- Colleges should have at least two emergency contacts for every child in the College in case of emergencies and in case there are welfare concerns at the home.
- Maintain a chronology of significant incidents for each child with safeguarding concerns, including a record of decisions made and the reasons for those decisions.
- Ensure such records are kept confidentially and securely and separate from the child's educational record.
- When a child leaves our College the Designated Safeguarding Lead will contact the Designated Safeguarding Lead at the new College and will ensure that the safeguarding file is forwarded to the receiving College within 5 College days. We will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving College and/or evidence of recorded delivery.

#### **Multi-agency working and information sharing:**

- The DSL recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance.
- Our College is not an investigating body when there are child protection concerns. We will, however, contribute to the investigation and assessment processes as required. We recognise the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

#### **Training:**

The DSL will ensure all staff undertake appropriate annual updates in order to:

- be able to recognise signs of abuse and how to respond to them, including special circumstances such as child sexual exploitation, female genital mutilation, fabricated or induced illness
- understand the assessment process for providing early help and intervention e.g. OSCB thresholds of need, preventative education and the local offer
- have a working knowledge of how the local authority conducts initial and review child protection (CP) case conferences and contribute effectively to these
- be alert to the specific needs of children in need (as specified in section 17 of the Children Act 1989), those with special educational needs, pregnant teenagers, young carers, those who are privately fostered, vulnerable to exploitation, racialisation and subject to listening to or hearing domestic abuse.
- Encourage a culture of listening to children and taking account of their wishes and feelings in any action the College takes to protect them.
- Ensure each member of staff has read and understood and abide by KCSE 2024, the College's

safeguarding policy and procedures, including providing induction on these matters to new staff members. Induction and training must include the College's behaviour policy and the College's procedures for managing children who are absent from education, as well as the staff code of conduct, the safeguarding policy, responsibilities in relation to filtering and monitoring in relation to ICT and dealing with disclosures and managing allegation processes.

- Organise face-to-face whole-College Safeguarding training for all staff members at least **every three years**.
- The DSL will ensure their training remains in date (every 2 years)
- All staff should be aware of key policies within their College which supports safeguarding and these should be explained to them as part of staff induction.
- Ensure the College allocates time and resource every year for relevant staff members to attend training and receive continuous professional development opportunities.
- Maintain accurate records of induction, ongoing training and continual professional development (CPD) relating to safeguarding.

#### **Awareness raising:**

- Ensure our College's safeguarding policies are known, understood and followed appropriately
- Ensure our College's safeguarding policy is reviewed annually (as a minimum) and the procedures are updated and reviewed regularly
- Ensure our safeguarding policy is available publicly and parents know referrals about suspected abuse or neglect may be made and the role of the College in this.
- Ensure that all staff are aware of the College's policy on ICT and understand the expectations, applicable roles and responsibilities in relation to filtering and monitoring.

#### **Quality assurance:**

- Monitor the implementation of and compliance with policy and procedures, including periodic audits of Safeguarding files (at a minimum once a year).
- Complete the 175/157 annual safeguarding report and submit to the Local Authority
- Provide regular reports to the governing body detailing changes and reviews to policy, training undertaken by staff members and the number of children with child protection plans and other relevant data.
- Take lead responsibility for remedying any deficiencies and weaknesses identified in Safeguarding arrangements.

#### **Support for staff:**

- The College will have a framework for providing an opportunity for staff who are working directly with vulnerable young people to have regular access to an appropriate manager to talk through and reflect on their involvement with the child's case.

## APPENDIX B: SAFEGUARDING DEFINITIONS AND PROCEDURES

### Definitions:

- **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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.
- **Children** are any people who have not yet reached their 18<sup>th</sup> birthday; a 16-year-old, whether living independently, in further education, in the armed forces or in hospital, is a child and is entitled to the same protection and services as anyone younger. KCSIE applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021.
- **Child protection** is part of safeguarding and promoting the welfare of children and is defined for the purpose of this guidance as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
- **Early help** means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years to teenage years.
- **Harm** is ill treatment or impairment of health and development, including impairment suffered from seeing or hearing the ill treatment of another.
- **Safeguarding children** is the action we take to promote the welfare of children and protect them from harm.
- **Safeguarding and promoting the welfare of children** is defined as:
  - protecting children from maltreatment
  - preventing the impairment of children's mental health, physical health or development
  - ensuring the children grow up in circumstances consistent with the provision of safe and effective care
  - taking action to enable all children to have the best outcomes.
  - Effective safeguarding means practitioners should understand and be sensitive to factors, including economic and social circumstances and ethnicity, which can impact children and families' lives.

College staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating (KCSIE 2024)

A bespoke helpline is available for children and young people who've experienced abuse at College, and for worried adults and professionals that need support and guidance. If you are concerned about something, you can contact the NSPCC helpline Report Abuse in Education on **0800 136 663** or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

- **Significant harm** is the threshold that justifies compulsory intervention in the family in the best interests of the child. Section 47 of the Children Act 1989 states 'where the question of whether harm suffered by a child is significant turns on the child's health or development; his health or development shall be compared with that which could reasonably be expected of a similar child.'



- **Vulnerable children:** Any child may benefit from [Early Help and the Locality Community Support Service \(LCSS\) - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](#) but all College and College staff should be particularly alert to the potential need for early help for a child who:
  - is disabled and has specific additional needs
  - has special educational needs (whether they have a statutory Education, Health and Care Plan)
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
  - is frequently missing/goes missing from care or from home
  - is at risk of modern slavery, trafficking or exploitation
  - is at risk of being radicalised or exploited
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse  
<https://www.gov.uk/government/collections/domestic-abuse-bill>
  - is misusing drugs or alcohol themselves
  - has returned home to their family from care
  - is a privately fostered child

#### **Categories of abuse/neglect/and exploitation:**

- **Emotional abuse** is the persistent emotional maltreatment of a child such that it causes severe and persistent adverse effects on the child's emotional development and conveying that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may include:
  - not giving the child opportunities to express their views
  - deliberately silencing them or 'making fun' of what they say or how they communicate
  - including where students see, hear, or experience effects' of domestic violence.
 It may feature:
  - age or developmentally inappropriate expectations being imposed on children
  - interactions that are beyond a child's developmental capability
  - overprotection and limitation of exploration and learning
  - preventing the child from participating in normal social interaction
  - seeing or hearing the ill-treatment of another
  - 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.

- **Neglect** is the persistent failure to meet a child's basic physical or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. Once a child is born, it may involve a parent 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 care givers
  - ensure access to appropriate medical care or treatment
  - including where they see, hear, or experience effects of domestic violence

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Educational neglect is also considered: <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/neglect/>

- **Physical abuse** may involve hitting, shaking, throwing, poisoning, burning, 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.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) 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 \(KCSIE 2024\)](#).

### **Mental health**

- All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern immediate action should be taken, following the OIC safeguarding policy and by speaking to the designated safeguarding lead or a deputy.

<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>

The department has published advice and guidance [Preventing bullying - GOV.UK \(www.gov.uk\)](#) and [Mental Health and Behaviour in Colleges](#). In addition, Public Health England has produced a range of resources to support secondary College teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Every Mind Matters](#) for links to materials and lesson plans.

## **APPENDIX C: ATTENDANCE AND STUDENTS MISSING FROM COLLEGE OR BOARDING**

Students being absent from class or boarding, particularly repeatedly and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues, including neglect, child sexual and child criminal exploitation, mental health problems, risk of travelling to conflict zones, etc.

All staff must respond promptly to a student absence (as set out in our 'Attendance Policy') to ensure that the student is safe, that we know where they are and the reason for the absence.

### **Prolonged absences**

The College will inform the local authority of any student who has been absent for a prolonged period (without the College's permission for a continuous period of 10 days or more) and/or on repeated occasions and work with the local authority children's services, in line with the "Working together to improve College attendance" guidance.

Failure to report children missing from education would constitute non-compliance with the duty to have regard to Keeping Children Safe in Education. Children who go missing from College or boarding with no explanation, or who fail to return after a planned absence, will be regarded in the first instance as an immediate safeguarding concern. Every effort will be made to locate the child, [liaising with MASH, the police, embassies and border control as well as Local Authority officers as appropriate](#).

We will inform the local authority of any student who is going to be deleted from our College Admissions Register where s/he:

- has been taken out of College by her/his parents and the College has received written notification from the parent that s/he is being educated outside the College system, e.g., home education \*;
- has ceased to attend College and no longer lives within reasonable distance of Oxford;
- has been certified by a relevant medical practitioner as unlikely to be in a fit state of health to attend College before ceasing to be of compulsory College age, and neither the student nor his/her parent(s) has indicated the intention to continue to attend this College after ceasing to be of compulsory College age;
- is in custody for a period of more than four months due to a final court order and we as a College do not reasonably believe s/he will be returning to the College at the end of that period; or,
- has been permanently excluded.

\* In accordance with the recommendation of KCSIE (September 2023), if a parent expresses their intention to remove their son/daughter from the College with a view to educating at home, we will work with the local authority and other key professionals to try to coordinate a meeting with parents to discuss this.

The notification will be made as soon as the grounds for deletion are met, but no later than deleting the student's name from the register.

## **Children Who Are Absent from Education**

All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory College age who are absent for prolonged periods or missing from education in their area.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and criminal exploitation - particularly county lines. College staff should follow the College's procedures for dealing with children who are persistently absent and children missing education to identify such abuse as early as possible and, in the case of absent students, this helps prevent the risk of them becoming a child absent from education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and have a social worker (such as a child who is a child in need, who has a child protection plan or is a child we care for), where being absent from education may increase known safeguarding risks within the family or in the community. See 'working together to improve College attendance' for further guidance:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1099677/Working\\_together\\_to\\_improve\\_College\\_attendance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1099677/Working_together_to_improve_College_attendance.pdf)

Colleges should put in place appropriate safeguarding policies, procedures and responses for children who are identified as absent or missing from education, particularly on repeat occasions. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

The law requires all Colleges to have an admission register and, with the exception of Colleges where all students are boarders, an attendance register. All students must be placed on both registers. An appropriated response is needed when a child has poor attendance or is regularly missing education.

<https://www.gov.uk/government/publications/children-missing-education>

All Colleges must inform their local authority of any student who is going to be deleted from the admission register where they:

- have been taken out of College by their parents and are being educated outside the College system e.g. home education, have ceased to attend College and no longer live within reasonable distance of the College at which they are registered
- have been certified by an appropriate medical practitioner as unlikely to be in a fit state of health to attend College before ceasing to be of compulsory College age and neither he/she nor his/her parent has indicated the intention to continue to attend the College after ceasing to be of compulsory College age
- are in custody for a period of more than four months due to a final court order and the proprietor does not reasonably believe they will be returning to the College at the end of the period
- have been permanently excluded

The local authority must be notified when a College is to delete a student from its register under the above circumstances. Colleges should contact the Admissions Team: Tel: 01865 815175. This should be done as soon as the grounds for deletion are met, but no later than deleting the student's name from the register. It is essential that Colleges comply with this duty, so that local authorities can, as part of their duty to identify children of compulsory College age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect.

All Colleges must inform the local authority of any student who fails to attend College regularly or has been absent without the College's permission for a continuous period of 10 College days or more, at such intervals as are agreed between the College and the local authority (or in default of such agreement, at intervals determined by the Secretary of State).

## APPENDIX D: FURTHER INFORMATION

### Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM or already having suffered FGM. [Harmful Practices - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](http://oscb.org.uk)

- **Indicators** - There is a range of potential indicators that a girl may be at risk of FGM. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi-Agency Practice Guidelines, and Chapter 9 of those Guidelines (pp42-44) focuses on the role of Colleges and Colleges. Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) gives the Government powers to issue statutory guidance on FGM to relevant persons. Once the government issues any statutory multi-agency guidance this will apply to Colleges and Colleges.
- **Actions** - If staff have a concern they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Mandatory reporting commenced in October 2015. These procedures remain when dealing with concerns regarding the potential for FGM to take place. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police.
- **Mandatory Reporting Duty** -From October 2015, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) placed a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the College's designated safeguarding lead and involve the Integrated Front Door as appropriate.

### Fabricated or Induced Illness

Staff must be aware of the risk of children being abused through fabricated or induced illness (FII). There are three main ways of the carer fabricating or inducing illness in a child.

These are not mutually exclusive and include:

- fabrication of signs and symptoms. This may include fabrication of past medical history
- fabrication of signs and symptoms and falsification of hospital charts and records and specimens of bodily fluids. This may also include falsification of letters and documents
- induction of illness by a variety of means

Where this is identified and considered a risk a referral will be made to the MASH for support and guidance. College may involve other agencies in making their assessments. That could include College nurse, community paediatrician, occupational therapists for example.

### **Gang and Youth / Serious Violence**

Children and Young People who become involved in gangs are at risk of violent crime and as a result of this involvement are deemed vulnerable. Agencies and professionals have a responsibility to safeguard these children and young people and to prevent further harm both to the young person and their potential victims. Risks associated with gang activity include access to weapons (including firearms), retaliatory violence and territorial violence with other gangs, knife crime, sexual violence and substance misuse <https://www.gov.uk/government/publications/serious-violence-strategy>

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)

### **Faith Based Abuse**

Our policy recognises the 'National Action Plan to Tackle Abuse linked to faith or belief' which describes this abuse as:

*'not about challenging people's beliefs, but where beliefs lead to abuse that must not be tolerated. This includes belief in witchcraft, spirit possession, demons or the devil, the evil eye, or djinns, dakini, kindoki, ritual or muti murders and use of fear of the supernatural to make children comply with being trafficked for domestic slavery or sexual exploitation. The beliefs which are not confined to one faith, nationality or ethnic community.'*

When this type of abuse is suspected staff will make a referral to the MASH Team for support and guidance.

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

### **Risk of Trafficking**

Article 3 of the Palermo Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention Against Transnational Organised Crime to the UN Convention (2000) (ratified by the UK on 6 February 2006) defines trafficking as:

- "Trafficking of persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose

of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.

- The consent of a victim of trafficking in persons to the intended exploitation set forth in sub-paragraph (a) of this article shall be irrelevant where any of the means set forth in subparagraph (a) have been used.
- The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered “trafficking in persons” even if this does not involve any of the means set forth in sub-paragraph (a) of this article
- “Child” shall mean any person under eighteen years of age.

Children trafficked into the country may be registered at a College for a term or longer, before being moved to another part of the UK or abroad. This pattern of registration and de-registration may be an indicator that a child has been trafficked. It has been identified as a particular concern in Colleges which are situated near ports of entry, but practitioners should be alert to this possibility in all Colleges. However, practitioners should always bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, traveller or migrant families – who collectively go missing from College.

If a member of the College staff suspects that a child may have been trafficked, they should act immediately to inform the senior member of staff with designated responsibility for child protection and ensure that police or local authority children’s social care are contacted immediately.

### **Risks Associated with Parent/Carer Mental Health**

The majority of parents who suffer mental ill-health can care for and safeguard their children and/or unborn child. Some parents, however, will be unable to meet the needs and ensure the safety of their children.

Our approach is to recognise, seek support, instil preventive factors and monitor. Designated Safeguarding Lead should seek support through Early Help team but escalate to the MASH Team if they are concerned that the child involved is being placed at immediate risk of harm.

### **Drugs and Alcohol**

Children can be at risk of drugs and alcohol directly and indirectly. They may be at direct risk of having access to these substances (see guidance on gangs) or indirectly because they effect family life at home through use by parents/carers, siblings, child-minders etc. Risks associated with drugs and alcohol and should be built into the curriculum policy.

More details can be found at: [Substance Misuse - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](http://oscb.org.uk)

### **Honour Based Violence and Forced Marriages**

Honour Based Violence and Forced Marriage refers to a collection of practices used to control behaviour within families to protect perceived cultural or religious beliefs and honour. Violence can occur when offenders perceive that a relative has shamed the family or community by breaking their ‘code of honour’. Honour Based Violence cuts across all cultures and communities: Turkish, Kurdish,



Afghani, South Asian, African, Middle Eastern, South and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, HBV may exist.

'A forced marriage is a marriage in which one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual and emotional pressure.' In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

For more information see:

<http://www.fco.gov.uk/en/travel-and-living-abroad/when-things-go-wrong/forced-marriage/>

<http://www.karmanirvana.org.uk/>

**Managing Allegations against College Staff (including those accessing the College premises)** The Local Authority Designated Officer for Allegations (LADO) must be told of allegations against adults working with children and young people within 24 hours. This includes allegations relating to individuals or organisations using the College premises for the purpose of running activities for children (for example community groups, sports associations or service providers that run extra-curricular activities). As with any safeguarding allegation, Colleges and Colleges should follow their safeguarding policies and procedures, including informing the LADO. Chairs of Governors should refer to this guidance if there is an allegation against the Principal. This includes all cases that meet the harm threshold where a person is alleged to have:

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

College, that might make an individual unsuitable to work with children and is known as transferable risk. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO)

There are two levels of allegation/concern:

- allegations that may meet the harms threshold (see definition above)
- allegation/concerns that do not meet the harm threshold – referred to in 2023 guidance as 'low level concerns'

Governing bodies and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold. Concerns may arise in several ways and from a number of sources. For example: suspicion, complaint or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is important that Colleges and Colleges have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

'Low Level Concerns' - Creating a culture in which all concerns about adults, including allegations that do not meet the harm threshold, are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the College may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- humiliating students

Such concerns should always be recorded and reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified

The Local Authority Designated Officer is **Jo Lloyd**, contactable by phone on 01865 810603 or by email at [lado.safeguardingchildren@oxfordshire.gov.uk](mailto:lado.safeguardingchildren@oxfordshire.gov.uk)

An Allegation and Consultation Referral Form must be completed by the Principal or manager in full and forwarded to the LADO via email within 24 hours of the concern being raised.

### **Preventing Radicalisation**

Protecting children from the risk of radicalisation should be part of Colleges' wider safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent susceptible people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media has become a major factor in the radicalisation of young people. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. College staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme

From 1 July 2015 all Colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 ('The CTSA 2015'). Colleges must have regard to statutory PREVENT GUIDANCE updated December 2023. Paragraphs 57-76 of the Prevent guidance are concerned specifically with Colleges' responsibility to the need to prevent people from being drawn into terrorism. This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. The prevent Duty first objective is to "tackle the ideological causes of terrorism" and the College has a duty in 'reducing permissive environments'. This means that the College is expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to

demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Colleges and Colleges should have clear procedures in place for protecting children at risk of radicalisation. It is not necessary for Colleges and Colleges to have distinct policies on implementing the Prevent duty. The Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all Colleges should ensure that their safeguarding arrangements consider the policies and procedures of Local Safeguarding Children Board (LSCBs).

The statutory Prevent guidance summarises the requirements on Colleges in terms of four general themes:

- risk assessment
- working in partnership
- staff training
- IT policies

Designated safeguarding leads and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#).

The **Prevent** guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual Colleges are best placed to assess the training needs of staff in the light of their assessment of the risk to students at the College of being drawn into terrorism. As a minimum, however, Colleges should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

Colleges must ensure that children are safe from terrorist and extremist material when accessing the internet in Colleges. Colleges should ensure that suitable filtering is in place. It is also important that Colleges teach students about online safety more generally. Further information and guidance are available on the OSCB website: [Radicalisation - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](#)

The Department for Education has also published advice for Colleges on the Prevent duty and is intended to complement the Prevent guidance and signposts other sources of advice and support.

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

## **Channel**

College staff should understand when it is appropriate to make a referral to the Channel team. Channel is a programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. It provides a mechanism for Colleges to make referrals if they are concerned that an individual might be susceptible to radicalisation.

An individual's engagement with the programme is entirely voluntary at all stages and an individual will be required to provide their consent before any support delivered through the programme is provided.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the local authority and include the police for the relevant local authority area. Following a referral, the panel will assess the extent to which identified individuals are at risk of being drawn into terrorism and, where considered appropriate and necessary, consent is obtained and support arranged and provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel

panels to co-operate with the panel in the carrying out of its functions and with the police in providing information about a referred individual.

Colleges and Colleges are required to have regard to Keeping Children Safe in Education and, as partners, are required to cooperate with local Channel panels. Channel guidance can be found here:

<https://www.gov.uk/government/publications/channel-and-prevent-multi-agency-panel-pmap-guidance>

### **Child Sexual Exploitation & Child Criminal Exploitation**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be treated as exploitation. As well as being physical, it can be facilitated and/or take place online.

### **Child Sexual Exploitation (CSE)**

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17- year-olds who can legally consent to have sex. It can include both contact (penetrative and non- penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media). CCE indicators can also be indicators of CSE, as can children who have older boyfriends or girlfriends and children who suffer from sexually transmitted infections or become pregnant.

The department provide: [Child sexual exploitation: guide for practitioners](#)

A full list of indicators can be found here: [Child Sexual Exploitation - Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](#)

### **Child Criminal Exploitation (CCE)**

While there is still no legal definition of 'Child Criminal Exploitation' or CCE, it is increasingly being recognised as a major factor behind crime in communities, while also simultaneously victimising vulnerable young people and leaving them at risk of harm. A simple definition of CCE is: CCE often occurs without the victim being aware that they are being exploited and involves young people being encouraged, cajoled or threatened to carry out crime for the benefit of others. In return they are offered friendship or peer acceptance, but also cigarettes, drugs (especially cannabis), alcohol or even food and accommodation.

**County Lines** is a term used to describe gangs, groups or drug networks that supply drugs from urban to suburban areas across the country, including market and coastal towns, using dedicated mobile phone lines or 'deal lines.' They exploit children and vulnerable adults to move the drugs and money to and from the urban area, and to store the drugs in local markets. They will often use intimidation, violence and weapons, including knives, corrosives, and firearms. County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery and missing persons and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and voluntary and community sector organisations. County lines activity and the associated violence, drug dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities. Further information can be found here: [Child Criminal Exploitation- Oxfordshire Safeguarding Children Board \(oscb.org.uk\)](https://www.oscb.org.uk)

### **Sexual Harassment, Violence, Harmful Sexual Behaviours (inc. child on child abuse, consent and 'upskirting')**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration and sexual assault.

It is important that Colleges and Colleges are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of College/College. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Staff must challenge any form of derogatory and sexualised language or behaviour. Staff should be vigilant to sexualised/aggressive touching/grabbing. DfE guidance situates sexual violence, sexual harassment and harmful sexual behaviour in the context of developing a whole-College safeguarding culture, where sexual misconduct is seen as unacceptable and not 'banter' or an inevitable part of growing up. Advice about tackling and reporting sexual harassment in Colleges and Colleges is available in the DfE guidance Keeping Children Safe in Education 2023

It should be recognised that these issues are likely to occur and so Colleges should have procedures in place to deal with them. Groups at particular risk include girls, students who identify as Lesbian, Gay, Bisexual, Transgender+ (LGBT+) or are perceived by peers to be LGBT+ and students with SEND. We recognise that these children can be targeted by other children, so it is vital our College provides a safe space for these children to speak out and share their concerns with members of staff. Students are protected from 'upskirting', bullying, homophobic, biphobic and transphobic behaviour, racism, sexism and other forms of discrimination Staff have familiarity with the [Equality Act 2010 and the Public Sector](#)

Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding

<https://www.gov.uk/government/consultations/human-rights-act-reform-a-modern-bill-of-rights/outcome/human-rights-act-reform-a-modern-bill-of-rights-consultation-response> ,

Our College acknowledges the need to treat everyone equally, with fairness, dignity and respect. Any discriminatory behaviours are challenged and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. Colleges must record incidents across the whole spectrum of sexual violence, sexual harassment and harmful sexualised behaviours so that they can understand the scale of the problem in their own Colleges and make appropriate plans to reduce it.

All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) or equivalent and managed in line with your setting's child protection policies. Victims of harm should be supported by the College's pastoral system, their wishes and feelings considered and they understand the law on child-on-child abuse is there to protect them, not criminalise them.

The appropriate safeguarding lead person should be familiar with the full guidance from the UK Council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>

## **Upskirting**

'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender can be a victim. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

## **Consent**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: [Rape Crisis England & Wales -](#)

Sexual consent

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16

## **Online Safety, Remote Learning and Filtering & Monitoring**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole College and College approach to online safety empowers a College to protect and educate students, students and staff in their use of technology and establishes mechanisms to identify, intervene in and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users, for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other
- **conduct:** online behaviour that increases the likelihood of, or causes, harm, for example, making, sending and receiving explicit images (e.g. consensual and non- consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If you feel your students, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

The College has an Online Safety policy, which covers the use of mobile phones, cameras and other digital recording devices e.g. i-Pads. For online safety, within the policy there is support about children accessing the internet whilst they're at College using data on their phones. This considers that many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G networks. This access means some children, whilst at College, sexually harass, bully and control others via their mobile and smart technology, share indecent images consensually and non- consensually and view and share pornography and other harmful content. This has been carefully considered within College's ICT Policy, including the management of devices, filtering and monitoring and access to smart technology. The policy also reinforces the importance of online safety, including making parents aware of what the College asks children to do online (e.g. sites they need to visit or who they'll be interacting with online)

### **Filters and monitoring**

Governing bodies and proprietors are doing all that they reasonably can to limit children's exposure to the above risks from the College's IT system. As part of this process, governing bodies and proprietors ensure their College has appropriate filters and monitoring systems in place and that there is regular review of their effectiveness.

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors also consider the age range of their students, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

The appropriateness of any filters and monitoring systems are a matter for individual Colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

To support Colleges and Colleges to meet this duty, the Department for Education has published filtering and monitoring standards (see below link) which set out that Colleges and Colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems
- review filtering and monitoring provision at least annually



- block harmful and inappropriate content without unreasonably impacting teaching and learning
- have effective monitoring strategies in place that meet their safeguarding needs

Governing bodies and proprietors understand their responsibilities for periodically reviewing the effectiveness of these procedures and the standards and will discuss this with IT staff and service providers, discussing what more needs to be done to support Colleges and Colleges in meeting this standard. This includes an understanding of responsibilities to have an appropriate level of security protection and an understanding of evolving cyber-crime technologies and e-security.

Monitoring and filtering standards: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-Colleges-and-Colleges/filtering-and-monitoring-standards-for-Colleges-and-Colleges>

Cyber security standards: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-Colleges-and-Colleges/cyber-security-standards-for-Colleges-and-Colleges>

The policy for remote learning demonstrates an understanding of how to follow safeguarding procedures when planning remote education strategies and teaching remotely. The College maintains the capability to provide remote education when it is not possible for some or all of their students to attend in person.

<https://www.gov.uk/government/publications/providing-remote-education-guidance-for-Colleges>

### **Safer Recruitment and Pre-Appointment Checks**

Any offer of appointment made to a successful candidate, including one who has lived or worked abroad, must be conditional on satisfactory completion of the necessary pre-employment checks.

When appointing new staff, Colleges and Colleges must:

- verify a candidate's identity. Identification checking guidelines can be found on the GOV.UK website
- obtain (via the applicant) an enhanced DBS certificate (including barred list information for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role
- verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, follow advice on the GOV.UK website
- if the person has lived or worked outside the UK, make any further checks the College consider appropriate and verify professional qualifications, as appropriate
- verify professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.



- carry out an online search on shortlisted candidates to help identify any issues that are publicly available online. Shortlisted candidates will be informed before online searches are carried out. Ensure that evidence of these checks has been retained.

In addition:

- independent Colleges, including academies and free Colleges, must check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State
- maintained Colleges must check that the Governing body is not subject to a section 128 direction made by the Secretary of the State
- ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State for prohibition checks or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012
- all Colleges and Colleges providing childcare must ensure that appropriate checks are carried out to ensure that individuals employed to work in reception classes or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations.

The Education and Training (Welfare of Children) Act 2021 extended safeguarding provisions to providers of post 16 Education: 16-19 Academies, Special Post-16 institutions and Independent Training Providers.

### **Single Central Record**

Colleges and Colleges must keep a single central record. The single central record must cover the following people:

- all staff (including supply staff and teacher trainees on salaried routes) who work at the College. In Colleges, this means those providing education to children
- The information that must be recorded in respect of staff members (including teacher trainees on salaried route) is whether the following checks have been carried out or certificates obtained and the date on which each check was completed/certificate obtained
- an identity check / a barred list check / an enhanced DBS check / certificate / a prohibition from teaching check
- further checks on people who have lived or worked outside the UK – overseas checks/right to work
- a check of professional qualifications and a check to establish the person's right to work in the United Kingdom

For supply staff, Colleges should also include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff and the date that confirmation was received.

For 3<sup>rd</sup> party contactors, letters of assurance or contracts and service level agreements will be in place providing assurance that any adult deployed to OIC will have undergone the appropriate level of DBS check and safeguarding training.

The details of an individual should be removed from the single central record once they no longer work at the College.

Governors are required to have an enhanced criminal records certificate from the DBS. It is the responsibility of the governing body to apply for the certificate for any governor who does not already have one. Governance is not a regulated activity and so they do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity.