



**OXFORD
International
College
Brighton**

A NORD ANGLIA EDUCATION SCHOOL

CHILD PROTECTION AND SAFEGUARDING POLICY

POLICY INTENDED FOR:	Parents, Students, Staff
CATEGORY:	Complaints
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CHILD PROTECTION AND SAFEGUARDING POLICY

INTRODUCTION

Our College should provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child free from discrimination or bullying where children can learn and develop happily.

This policy has been developed in accordance with the principles established by the Education and Skills Act 2008, the Children Acts 1989 and 2004, the Children and Social Work Act 2017 and the Childcare Act 2006; the Education (Independent School Standards) Regulations 2014, the National Minimum Standards for Boarding Schools and the Early Years Foundation Stage Statutory Framework; and in line with government publications:

- Working Together to Safeguard Children (July 2018)
- Keeping Children Safe in Education (September 2021) (KCSIE)

and the guidance of Brighton and Hove Multi Agency Safeguarding Hub (MASH) now known as Front Door For Families (FDF) and Brighton & Hove Safeguarding Children Partnership (BHSCP).

This policy also takes into account further statutory guidance applicable to the school comprising:

- Disqualification under the Childcare Act 2006 (DfE, August 2018)
- Revised Prevent duty guidance for England and Wales (HM Government, July 2021)
- Channel duty guidance: protecting vulnerable people from being drawn into terrorism (HM Government, April 2015)
- Multi-agency statutory guidance on female genital mutilation (HM Government, July 2020)
- What to do if you're worried a child is being abused: advice for practitioners (HM Government, March 2015)
- Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (HM Government December 2020)
- Children missing education (DfE, September 2016)
- Child sexual exploitation: definition and a guide for practitioners local leaders and decision makers working to protect children from child sexual exploitation (DfE, February 2017)

- Sexual violence and sexual harassment between children in schools and colleges, Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads (September 2021)
- Teaching Online Safety in Schools (June 2019)
- Relationships education, relationships and sex education and health education guidance (DfE, June 2019)

At Oxford International College our Governing Body takes seriously its responsibility under Section 11 of the Children Act and duties under “Working Together to Safeguard Children 2018” to safeguard and promote the welfare of children; to work together with other agencies such as Brighton and Hove MultiAgency Safeguarding Hub (MASH) now known as Front Door For Families (FDFF) and Brighton & Hove Safeguarding Children Partnership (BHSCP) to ensure adequate arrangements exist within our setting to identify and support those children who are suffering harm or are likely to suffer harm. Our approach reflects the local criteria for action and the local protocol for assessments

We recognise that all our staff and governors have a full and active part to play in protecting our students from harm, and that the child’s welfare is our paramount concern.

We operate our safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by Front Door For Families (FDFF). Our policy will reflect the local protocol for assessments.

This policy applies to all our staff, governors and volunteers working in our College. This policy has been written in line with, and should be read alongside, Keeping Children Safe in Education 2021.

All staff will sign to confirm they have read and understood this policy. Key contact details can be found at the end of the policy.

POLICY STATEMENT

- “Safeguarding and promoting the welfare of children” is defined for the purposes of this guidance as:
 - protecting children from maltreatment,
 - preventing impairment of children’s mental and physical health or development,
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
 - taking action to enable all children to have the best outcomes.
- The term ‘staff’ applies to all those working for or on behalf of the college, full time, or part time, in either a paid or voluntary capacity. This also includes supply staff, parents and governors.
- ‘Child’ refers to all young people who have not yet reached their 18th birthday. On the whole, this will apply to all students of our College; however, the policy will extend to visiting children and students from other establishments.
- “Parent” refers to birth parents and other adults in a parenting role for example, adoptive parents, step parents, guardians and foster carers.
- ‘Abuse’ could mean neglect, physical, emotional, or sexual abuse or any combination of these. Parents, carers, and other people can harm children either by direct acts and / or failure to provide proper care. ’
- ‘DSL’ refers to Designated Safeguarding Lead.
- ‘DDSL’ refers to Deputy Designated Safeguarding Lead
- ‘LCSS’ refers to Locality Community Support Service.
- ‘FDF’ Front Door For Families children's social care department
- ‘LADO’ refers to the Local Authority Designated Officer (LADO)

WHAT'S THE DIFFERENCE BETWEEN SAFEGUARDING AND CHILD PROTECTION?

Safeguarding is a broader term than child protection. It encompasses all the elements set out above and is what a school should do for all children. Child Protection is part of this definition and refers to activities undertaken to protect children who have been harmed or are at significant risk of being harmed. Policies and procedures for Child Protection are, therefore, included in the Safeguarding policy and procedures.

Where a child is thought to be suffering significant harm, or to be at risk of suffering significant harm, this must be reported to children’s social care immediately. Action must also be taken to promote the welfare of children who are believed to be in need of additional support, even if they are not suffering harm or at immediate risk. Such instances must be addressed through inter-agency assessment using local processes.

THE AIMS OF OUR PROCEDURES ARE

- To provide staff with the framework to promote and safeguard the wellbeing of children and in so doing ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the College and ensure that safeguarding follows a whole College approach.

RELATED SAFEGUARDING POLICIES

This policy should be read in conjunction with the policies as listed below:

- Promoting Good Behaviour
- E-Safety
- Anti-Bullying
- Data Protection and Information Sharing
- Image Use
- Relationships and Sex Education
- Health and Safety
- Attendance
- Risk Assessments (e.g. College trips, use of technology)
- First Aid and Accidents
- Staff Code of Conduct (including Acceptable Use of Technology)
- Staff Handbook
- Safer Recruitment
- Whistleblowing

POLICY REVIEW

As a College, we review policies at least annually in line with DfE, local authority requirements and other relevant statutory guidance.

PRINCIPLES AND VALUES

The central principle is that our approach must always be child-centred and that the welfare of the child is the paramount consideration. In all situations, and, in particular, where there may be a potential conflict of interest, the child's best interests must always be the primary aim of every action or decision.

- All staff should be aware that safeguarding incidents can happen anywhere and at any time, and that they are required to be alert to any possible concerns. Safeguarding incidents can be associated with external factors outside of the school or family, so other contextual factors should be considered.

- All staff in a school have a responsibility to identify children who may benefit from 'early help'. 'Early help' means providing support as soon as a problem emerges. In the first instance, staff should discuss early help requirements with the Designated Safeguarding Lead (DSL) who will, where appropriate, refer the issue to children's social care who, in turn, may initiate an 'early help assessment'. Staff may be required to support local agencies and professionals in an 'early help assessment'.
- All students know that there are adults to whom they can turn if they are worried. These include teaching and pastoral staff and, in the case of boarders, Heads of House, Head of Boarding and the Independent Listener.
- If staff members have concerns about a child, they should raise these with the school's Designated Safeguarding Lead (DSL) without delay. Situations that involve staff at the school should be reported directly to the Principal. Reporting to the DSL also includes instances where there is a concern that a child or young person may be at risk of being radicalised or drawn into extremism. The Designated Safeguarding Lead and Designated Staff will usually decide whether to make a referral to children's social care. It is important to note, however, that any member of staff can refer their concerns to children's social care and/or police directly.
- This last point is stressed in the DfE guidance. 'Keeping Children Safe in Education' makes clear that 'anybody can make a referral'.
- If a child is thought to be in immediate danger or is at risk of harm, a referral will be made immediately to children's social care or to the police. Remember that anyone can make a referral but the Designated Safeguarding Lead should be informed as soon as possible that a referral has been made.
- If staff members have concerns of a safeguarding or child protection nature about another member of staff, including supply staff and volunteers, then this must be referred to the Principal without delay or, in their absence, to the Chair of the Board of Governors.
- If the Designated Safeguarding Lead believes that a crime may have been committed, then the matter will be reported to the police without delay.
- If the child's situation does not appear to improve, the staff member with concerns should press for re-consideration. In such instances, the Designated Safeguarding Lead must be informed as soon as possible.
- Members of staff should be aware that they may be asked to support social workers to take decisions about individual children. Schools and their staff are a part of a wider safeguarding system for children, and schools should work with all other agencies involved including social care, health services and the police, to promote the welfare of children and to protect them from harm.
- Raising concerns: all staff and volunteers should feel able to raise concerns about poor or unsafe practice and about potential failures in the school's safeguarding systems or processes,

and that such concerns will be taken seriously by the school's senior leadership. For more detail, please see the section below on Whistleblowing and Low Level Concerns

- Recording: full and clear record keeping at all stages of the child protection process is essential
- Confidentiality: where his or her safety is at stake, confidentiality cannot and must not be promised to a child. Confidentiality is always qualified and never absolute when a child is at risk. In this context, it means 'not holding information which should be shared, and not sharing information that should not be shared'.
- Speed of response: issues of child protection must be dealt with very promptly: delay may be prejudicial to the child's safety.
- 'Do not investigate!' It is not for the school to investigate a suspicion of abuse, whether it be centred on a member of the school staff or a member of the child's family. The child should not be questioned beyond establishing that there is cause to refer the case to the relevant external agency.

Children have a right to feel secure and cannot learn effectively unless they do so. All children have a right to be protected from harm.

All staff have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm, either in the college or in the community, taking into account contextual safeguarding, in accordance with the guidance.

We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children.

Whilst the College will work openly with parents as far as possible, it reserves the right to contact Children's Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

LEADERSHIP AND MANAGEMENT

We recognise that staff anxiety around child protection can compromise good practice and so have established clear lines of accountability, training and advice to support the process and individual staff. In this college, any individual can contact the Designated Safeguarding Lead (DSL) or a Deputy (DDSL) if they have concerns about a young person.

The Principal takes overall responsibility for safeguarding, ensuring the DSL and DDSLs fulfil their roles and duties.

There is a nominated safeguarding governor who will take leadership responsibility for safeguarding. The Chair of the Board of Governors, will receive reports of allegations against the Principal and act on the behalf of the governing body.

As an employer we follow safer recruitment guidance as set out in KCSIE 2021. For contact details please see later in this document.

SAFER RECRUITMENT PRACTICES

- Oxford International 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.
- The Governing Body and Leadership Team are responsible for ensuring that the College follows safe recruitment processes outlined within guidance.
- Oxford International College is responsible for ensuring that the College keeps an accurate Single Central Record (SCR) in line with statutory guidance.
- The Governing Body will ensure that at least one of the people who conducts a recruitment interview has completed safer recruitment training.
- We advise all staff to disclose any reason that may affect their suitability to work with children, including convictions, cautions, court orders, reprimands and warnings.

Our procedures for the selection and recruitment of all staff and volunteers follow the government's recommendations for the safer recruitment of staff who work with children and young people. They comply with the principles and practices set out in 'Keeping Children Safe in Education' (September 2020) and with the Independent School Standards regulations (2014).

Members of the teaching and non-teaching staff at Oxford International College, including part-time staff, temporary and supply staff, and visiting staff such as peripatetic music teachers and sports coaches, are subject to the necessary statutory pre-appointment checks before starting work. Volunteers, host families accommodating our students, contractors working regularly during term-time and any agency or third-party staff whom we may use from time to time are also subject to the relevant statutory checks. The school will also seek to obtain confirmation that appropriate child protection checks and procedures apply to any staff employed by another organisation and working with our students here at school, on another site or at a separate institution.

Fuller details of our procedures for ensuring compliance with current regulations and guidance on staff recruitment are set out in the school's Safer Recruitment Policy.

DBS AND OTHER CHECKS ON CURRENT STAFF

KCSIE (September 2021) states that schools need to carry out new checks on existing staff under the following circumstances:

- if an individual working at the College moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children (in such circumstances, the relevant checks for that regulated activity must be carried out);
- if there has been a break in service for 12 weeks or more;
- if there are concerns about an individual's suitability to work with children

STAFF INDUCTION, AWARENESS AND TRAINING

- As part of their training all members of staff have read and understood Part One of “Keeping Children Safe in Education” (2021) which covers safeguarding information for all staff. College leaders will read the entire document. College leaders and all members of staff who work directly with children will confirm that they have read and understood Part One and Annex B of “Keeping Children Safe in Education” (2021). The DSL will ensure that all new staff and volunteers (including temporary staff) are aware of the College’s internal safeguarding processes and the role and identity of the DSL and deputies
- All staff members (including temporary staff) will receive training to ensure they are aware of a range of safeguarding issues.
- All staff members (including temporary staff) will receive regular safeguarding and child protection updates, at least annually on updates, at least annually in line with the local safeguarding authority advice, including Prevent, online safety and informal updates
- All staff members (including temporary staff) will be made aware of the College’s expectations regarding safe and professional practice via the staff code of conduct, staff handbook and Acceptable Use Policy.
- All staff will be aware of College policies including whistleblowing and acceptable use of IT, staff/pupil relationships, the low-level concerns policy and communications including use of social media).
- All staff will be aware of and understand the College’s Safeguarding Policy , acceptable use of IT Policy and Student Behaviour and Anti Bullying Policy
- All staff will be aware of the College’s safeguarding response to children who go missing from education

All staff will be trained to

- manage a report of child-on-child sexual violence and sexual harassment
- be aware of their role in the local early help process
- be aware of the process for making referrals to children’s social care
- know what to do if a child tells them he/she is being abused, exploited or neglected
- reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report.
- The DSL and Principal will provide an annual report to the Governing Body detailing safeguarding training undertaken by all staff and will maintain up to date register of who has been trained.

- Although the College has a nominated lead on the governing body all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.
- Staff training will involve regular updates at least annually, in line with local authority safeguarding advice, to include Prevent and on-line safety, plus informal updates

RECORD KEEPING

- Staff will record any welfare concerns that they have about a student and on the CPOMS system and pass them without delay to the DSL. Records will be completed on the same day as the incident/concern is reported to the staff member, using the child's words and facts, and will be signed and dated by the member of staff.
- All safeguarding concerns, discussions, and decisions (and justifications for those decisions) will be recorded in writing. If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.
- Safeguarding records are kept for individual children 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 and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.
- All safeguarding records will be transferred in accordance with GDPR to the child's subsequent College/setting, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.
- Our record keeping procedures are in line with the KCSIE 2021 guidance.

CONFIDENTIALITY AND INFORMATION SHARING

- Oxford International College recognises that all matters relating to child protection are confidential. The Principal or DSL will only disclose information about a student to other members of staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children. All staff must be aware that they cannot promise a child they will keep secrets which might compromise the child's safety or wellbeing.

- There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. DfE Guidance on Information Sharing (July 2018) provides further detail. www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

SAFETY PLAN

A safety plan should be put in place for any student where there is a specific vulnerability or a need to protect them from bullying, harassment or any other identified threat. Safety plans will be written by the pastoral team with the student and will then be communicated to parents for comment, with the agreed and signed document being circulated to all staff involved in implementing the plan, either directly via email or through staff briefing should all staff need to be made aware. Any updates to the document will also be communicated immediately. The plan must also be recorded on CPOMS. The safety plan is a living document and should be reviewed regularly, the time period to be agreed at the time of writing. It will also be informed by any updates received by external agencies such as the police, CAMHS, LCSS and so on.

STATUTORY ASSESSMENTS

Staff at college will be made aware of the process for making referrals to children's social care and for statutory assessments that may follow a referral, along with the role they may be expected to play in such assessments. As part of their statutory duties under the Children Act 1989, local authorities undertake assessments of the needs of individual children to determine which services to provide and what action to take. The member(s) of staff concerned may be asked to participate in such an assessment.

Staff need, in particular, to be aware of two types of assessments:

- A 'child in need assessment' - A child in need is defined under section 17(10) of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health or development is likely to be significantly or further impaired without the provision of services; or a child who is disabled.
- A 'child protection enquiry' – If the local authority has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, they have a duty to make enquiries under section 47 of the Children Act 1989 to enable them to decide whether they should take any action to safeguard and promote the child's welfare.

SAFEGUARDING CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES

It is recognised that children with special educational needs or disabilities (SEND) can present additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's impairment without further exploration;
- children with SEND can be disproportionately impacted by issues such as bullying, without necessarily showing outward signs;
- communication barriers.

It is important, therefore, to be particularly sensitive to these issues when considering any aspect of the welfare and safety of such children, and to seek professional advice where necessary. Oxford International College will ensure that children with SEN and disabilities, specifically those with communication difficulties, will be supported to ensure that their voice is heard and acted upon.

Members of staff are encouraged to be aware that children with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse.

REPORTING AND REFERRING CONCERNS

KCSIE 2021 states: "No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

In our college we recognise the importance of sharing information and reporting concerns to help ensure children are protected.

Our procedures apply to all staff working in the College and will be covered by training to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or is at risk of harm.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children with those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility which will include children visiting the site as well as those who are students.

If a member of staff suspects abuse of a child, spots signs or indicators of abuse, or mental health concerns or they have a disclosure of abuse made to them they must:

1. Make an initial record of the information on CPOMS as soon as possible and on the same day.
2. Report any concerns to the DSL immediately.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate factual record as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
 - 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
 - What action was taken
 - Any actual words or phrases used by the child
 - Any questions the staff member asked (remembering not to ask any leading questions)

Records must be signed and dated by the author.

5. In the absence of the DSL or a Deputy, be prepared to refer directly to Children's Social Care (and the police if appropriate), if there is the potential for immediate significant harm, the police will be contacted.

Following a report of concerns, the DSL must:

- Decide whether there are sufficient grounds for suspecting significant harm, in which case a referral must be made to Children's Social Care and the police if it is appropriate. The rationale for this decision should be recorded by the DSL.
- Normally the college should try to discuss any concerns about a child's welfare with the family and where possible, seek their agreement before making a referral to Children's Social Care. However, in accordance with DfE guidance, this should only be done when it will not place the child at increased risk or could impact a police investigation.

Where there are doubts or reservations about involving the child's family, the DSL should clarify with Children's Social Care or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be taken into account..

If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm the DSL (or Deputy) must contact Children's Social Care, sharing:

- a) the known facts
- b) any suspicions or allegations
- c) whether or not there has been any contact with the child's family.

If a child is in immediate danger and urgent protective action is required, the police must be called. The DSL must then notify Children's Social Care of the occurrence and what action has been taken.

When a student needs urgent medical attention and there is suspicion of parental abuse causing the medical need, the DSL or their Deputy should seek immediate advice from the local authority agency about informing the parents, remembering that parents should normally be informed if a child requires urgent hospital attention. However, as in all cases, if it is felt this could put the child more at risk then all action should be taken in the best interests of the child.

If there is not considered to be a risk of significant harm, the DSL will either actively monitor the situation, or contact the local authority or a no names consultation.

MULTI-AGENCY WORKING

- Oxford International College recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance.
- Colleges are not the investigating agency when there are child protection concerns. We will, however, contribute to the investigation and assessment processes as required. Oxford International College recognises 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.
- The College Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

ALLEGATIONS AGAINST STAFF OR VOLUNTEERS

This procedure should be used in all cases in which it is alleged a member of staff, supply staff, a volunteer in College, or another adult who works with children has:

- behaved in a way that has harmed a child, 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 he or she would 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.

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff or volunteer to the Principal as soon as possible.
- If an allegation is made against the Principal, the concerns need to be raised with the Chair of the Board of Governors as soon as possible. If the Chair of the Board of Governors is not available, then the Local Authority Designated Officer should be contacted directly.
- Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.
- Where an allegation relates to a member of supply staff provided by an agency, the agency should be fully involved.
- There may be situations when the Principal or Chair of the Board of Governors will want to involve the police immediately, for example, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

- Once an allegation has been received by the Principal or Chair of the Board of Governors, they will contact the LADO as soon as possible and before carrying out any investigation into the allegation other than preliminary enquiries. In liaison with the LADO, the College will determine how to proceed and if necessary, a referral will be made to the Front Door For Families (FDFF) and/or the police.

WHISTLEBLOWING IN A SAFEGUARDING CONTEXT

While the College 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. This does not replace the whistleblowing policy and should be read in conjunction with the College policy.

Whistleblowing is a term that is used when staff want to report a concern within their organisation that involves their manager or a person senior to them in the organisation which may prevent them from following the normal reporting systems. The Whistleblowing Policy protects staff from being punished for raising concerns.

Within Oxford International College, 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 behaving in a way that is placing children at risk, you should, in the first place, make the Principal aware.

If your concern is about the Principal you should raise this with the Chair of Governors by email.

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 for national organisations or make contact with the local authority.

If you believe that a member of the Designated Safeguarding Lead 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 LADO (Local Authority Designated Officer)

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 Front Door For Families (FDFF)

Further guidance for staff can be accessed through:

www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused-2 and through the NSPCC website <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

Contract details can be found at the end of this document.

ROLES AND RESPONSIBILITIES WITHIN OXFORD INTERNATIONAL COLLEGE

STAFF RESPONSIBILITIES

All staff have a key role to play in identifying concerns early and in providing help for children. To achieve this, they will be trained and expected to

- Establish and maintain an environment where children and young people feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the College who they can approach if they are worried or have concerns.
- Plan opportunities within the curriculum for children and young people to develop the skills they need to recognise, assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of "it could happen here" with regards to safeguarding.
- Record their concerns if they are worried that a child is being abused and report these to the DSL as soon as practical that day.
- Be prepared to refer directly to Social Care, and the police if appropriate, if there is a risk of significant harm and the DSL is not available.
- Follow the allegations procedures, as set out in this policy and KCSIE 2021, if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the local authority agency and take account of guidance issued by the DfE.
- Treat information with confidentiality but never promising to 'keep a secret'.
- Notify the DSL of any child or student on a child protection plan or child in need plan who has unexplained absence.
- Liaise with other agencies that support students and provide early help.
- Ensure they know who the DSL is and know how to contact them.
- Have an awareness of the Child Protection Policy, the Promoting Good Behaviour and Sanctions Policy, the Staff Code of Conduct procedures relating to the safeguarding response for children who go missing from education and the role of the DSL
- Manage a report of child-on-child sexual violence and sexual harassment
- Be aware of their role in the early help process
- Be aware of the process for making referrals to a student's social care
- Know what to do if a student tells them he/she is being abused, exploited or neglected
- Have an awareness of mental health problems and indicators of the child being at risk of harm.
- Reassure victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever be made to feel ashamed for making a report

SENIOR MANAGEMENT TEAM RESPONSIBILITIES

- Contribute to inter-agency working in line with Working Together to Safeguard Children 2018 guidance.
- Provide a co-ordinated offer of early help when additional needs of children and young people are identified.
- Ensure staff are alert to the various factors that can increase the need for early help as written in KCSIE 2021.
- Working with Children's Social Care, supporting their assessment and planning processes including the College's attendance at conference and core group meetings and the contribution of written reports for these meetings.
- Carry out tasks delegated by the governing body such as training of staff, safer recruitment and maintaining a single central register.
- Provide support and advice on all matters pertaining to safeguarding and child protection to all staff, regardless of their position within the College.
- Treat any information shared by staff or students with respect and follow agreed policies and procedures.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE) and the local authority procedures.

GOVERNING BODY RESPONSIBILITIES

The Governing Body provides oversight of safeguarding in the school. To

provide effective oversight the Governing Body will

- Ensure the College has effective safeguarding policies and procedures including a Child Protection Policy, a Staff Code of Conduct, a Promoting Good Behaviour Policy, and a written response to children who go missing from education.
- Ensure the local authority is informed in line with local requirements about the discharge of duties via the annual safeguarding report that is returned to the Education Safeguarding Advisory Team.
- Ensure recruitment, selection and induction follows safer recruitment practice including all appropriate checks.
- Ensure allegations against staff are dealt with by the Principal and that allegations against the Principal are dealt with by the Chair of Governors. Ensure a member of the Senior Leadership Team is appointed as Designated Safeguarding Lead and has this recorded in their job description.
- Ensure staff have been trained appropriately and this is updated in line with guidance.
- Ensure any safeguarding deficiencies or weaknesses are remedied without delay.
- Ensure a nominated governor for safeguarding is identified. Ensure that children are taught about safeguarding, including online safety.
- Ensure there is at least an annual review of safeguarding at the College

The Governing Body will ensure that the College's safeguarding policy is updated at least annually. The policy should be updated whenever needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.

DESIGNATED SAFEGUARDING LEAD (DSL) RESPONSIBILITIES

The DSL will always be a member of the school's senior leadership team and takes the lead responsibility for safeguarding and child protection, including on-line safety .

With the help and support of the other staff with designated responsibility, the DSL is responsible for:

- raising awareness and ensuring that the school's safeguarding policies are known and used appropriately by all members of the school community;
- offering guidance, advice and support to other colleagues where needed;
- initiating no-names consultations with the Locality Senior Social Worker;
- ensuring that prompt contact is made, by her or by another of the Designated Staff, with children's social care where there are concerns that a child may be at risk or in need of help,
- managing links with the local authority agency and any referrals that may need to be made to the children's social care and/or the LADO and, where appropriate, also to the DBS, the TRA or the police;
- and ensuring that all staff at the school receive the necessary Safeguarding induction and training on appointment, and that this is renewed at the required intervals.

The DSL will help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.

The DSL will ensure that the school complies with the safeguarding partner arrangements, contributing to multi-agency work by working with the local authority, the clinical commissioning group and the chief officer of police.

The DSL is responsible for sharing information about students joining the school with key staff where appropriate, such as the SENCO, and for outgoing students with the new school securely to enable them to have the support in place when that child arrives. As our responsibilities under the Prevent Duty are a part of our broader Safeguarding responsibilities, the DSL is also the 'Prevent designated lead'. In Line with KCSIE September 2021,

The role and responsibilities of the DSL and of the other members of the Designated Staff team are set out in detail in their respective job descriptions and follow the guidance provided in KCSIE, September 2021 .

The DSL is also responsible for reporting to the Board of Governors annually on all significant aspects of Safeguarding policy and procedures.

The DSL will:

- attend appropriate training and demonstrate evidence of continuing professional development to carry out the role.
- ensure every member of staff knows who the DSL and the DDSL are, have an awareness of the DSL role and know how to contact them.
- ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns about a child to the DSL and concerns about an adult to the Principal.
- ensure whole College training occurs regularly, with annual updates so that staff and volunteers can fulfil their responsibilities knowledgeably.
- ensure any members of staff joining the College outside the agreed training schedule receive induction prior to commencement of their duties.
- keep records of child protection concerns securely and separately from the main student file and use these records to assess the likelihood of risk.
- ensure that safeguarding records are transferred accordingly (separate from student files) and in a timely fashion when a child transfers from a school.
- ensure that, where a student transfers school and is subject to a child protection plan or is a child in care for their information is passed to the new school immediately and that the child's social worker is informed. Consideration should be given to convening a transition meeting prior to moving, if the case is complex or on-going.
- be aware of the training opportunities and information provided by local authority agency to ensure staff are aware of the latest local guidance on safeguarding.
- develop, implement and review procedures in the College that enable the identification and reporting of all cases, or suspected cases, of abuse
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children and young people, including children with a social worker, are experiencing, or have experienced, with teachers and College leadership staff.

DEALING WITH DISCLOSURES

All staff should ensure:

- A member of staff who is approached by a child or young person should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals, to help keep the child/young person or other children/young people safe. The degree of confidentiality should always be governed by the need to protect the child.
- Additional consideration needs to be given to children / young people with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. Ultimately, all staff have the right to make a referral to the police or social care directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, e.g. they are the only adult on the College premises at the time and have concerns about sending a child home.

GUIDING PRINCIPLES: THE SEVEN R'S

RECEIVE

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable REASSURE
- Reassure the student, but only so far as is honest and reliable
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure e.g., you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

RESPOND

- Respond to the student only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.
- Do not ask 'leading' questions i.e., 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child /young person why something has happened.
- Do not criticize the alleged perpetrator; the student may care about him/her, and reconciliation may be possible
- Do not ask the student to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the student that it will be a senior member of staff

REPORT

- Share concerns with the DSL as soon as possible/by the end of the day, in person, by phone or by email.
- If you are not able to contact your DSL or the Deputy, and the child is at risk of immediate harm, contact the children's services department directly (numbers are available at reception and in the tutor common room.)

RECORD

- If possible, make some very brief notes at the time, and record them as soon as possible on CPOMS
- Keep your original notes on file
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child 'student. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- Complete a body map to indicate the position of any noticeable bruising if appropriate
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

REMEMBER

- Support the child / young person: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Try to get some support for yourself if you need it. Counselling is available and will be organised by the Deputy Principal – Pastoral/DDSL.

REVIEW PROCESSES (LED BY DSL)

- Has the action taken provided good outcomes for the child / young person?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

ABUSE AND NEGLECT

Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the designated safeguarding lead (or deputies).

All College staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

DEFINITIONS AND INDICATORS OF ABUSE AND NEGLECT

ABUSE: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or tide marks
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

- In the social context of the College, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:
- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adult words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if the child or young person:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

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

INDICATORS OF EMOTIONAL ABUSE

Developmental issues

- Delays in physical, mental, and emotional development
- Poor College performance
- Speech disorders, particularly sudden disorders, or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at College, leaving late

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships
- Emotional responses
- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)

- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Most harm is produced in low warmth, high criticism homes, not from single incidents. Emotional abuse is difficult to define, identify/recognise and/or prove.

Emotional abuse is chronic and cumulative and has a long-term impact.

It is sometimes possible to spot emotionally abusive behaviour from parents and carer/s to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

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.

CHARACTERISTICS OF CHILD SEXUAL ABUSE:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.
- Most people who sexually abuse children are men, but some women sexually abuse too.

INDICATORS OF SEXUAL ABUSE

Physical observations

- Damage to genitalia, anus, or mouth

- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually provocative behaviour/promiscuity
- Hinting at sexual activity. Inexplicable decline in College performance
- Depression or other sudden apparent changes in personality as becoming insecure or clinging
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Onset of insecure, clinging behaviour
- Arriving early at College, leaving late, running away from home
- Suicide attempts, self-mutilation, self-disgust
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed

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

NSPCC research has highlighted the following examples of the neglect of children under 12:

- frequently going hungry

- frequently having to go to College in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (What to do if You're Worried a Child is Being Abused DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns College staff have should at least be discussed with the DSL.

INDICATORS OF NEGLECT

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The OSCB neglect toolkit provides a more detailed list of indicators of neglect and is available to all staff

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty, or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from College or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food

PEER ON PEER ABUSE (child on child)

Children can abuse other children (often referred to as peer on peer abuse), and this can happen inside of school, outside of school and online. All staff are advised to maintain an attitude of “it could happen here.” It is recognised that it is more likely that girls will be victims and boys’ perpetrators, but all peer on peer abuse is unacceptable and is taken seriously. It is very important that all staff challenge abusive behaviour between peers.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying; prejudice-based and discriminatory bullying); • abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling or anything causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting (which is a criminal offence) which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Oxford International College has a zero tolerance approach to peer on peer abuse. We will not down-play certain behaviours, eg, dismissing sexual harassment as “just banter,” “having a laugh” “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours, an unsafe environment for children and, in worst case scenarios, a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

We recognise that even if there are no reported cases on peer on peer abuse, such abuse may still be taking place and simply not being reported. Messages communicated to students, implicitly and explicitly, directly and indirectly, as part of our daily school life will always make absolutely clear that peer on peer abuse, in whatever form it may take, is not acceptable. Students can report peer on peer abuse to any member of staff; their concerns will always be taken seriously and dealt with promptly, firmly and fairly. Children may not find it easy to tell staff about abuse verbally, but they can show signs or act in ways that they hope adults will notice and react to. In some cases, a friend may make a report or a member of staff may overhear a conversation or observe a behaviour that indicates something is wrong. If staff have any concerns regarding a child's welfare, including concerns about peer on peer abuse, they must report it to the DSL or member of the safeguarding team immediately.

Allegations of peer on peer abuse will be recorded on CPOMS and will be followed up by the DSL or member of the safeguarding team, in liaison with external agencies as appropriate.

BULLYING, including cyberbullying:

Bullying may be defined as repeated (systematic) aggressive verbal, psychological or physical conduct by an individual or group against another person or persons. It may be deliberate harassment or an aggressive act of omission which causes physical or psychological hurt.

Very often bullying is the act of oppressing or dominating by threat or force where the aggressor may persecute or tease physically or morally in order to frighten into action or inaction. Bullying can also result from a one-off incident.

Bullying can include:

- Physical (eg, pushing, hitting, kicking, pinching, poking, biting, taking/damaging belongings);
- Verbal, in English or another language (name-calling, homophobic abuse, racist abuse, threats, belittling, spreading rumours, taunts, teasing, making disparaging or offensive remarks, sarcasm);
- Emotional (tormenting, ridiculing, humiliating, spreading rumours, ignoring, isolating, threatening gestures, manipulation, coercion, intimidation, hiding belongings);
- Cyber-bullying: in which emotional, psychological (eg, social exclusion) or verbal bullying can be conducted through a digital medium, such as text messages, social media or gaming and email, all of which may be used to transmit offensive or embarrassing messages and photographs.

The school's Anti-bullying policy sets out the detail of the policy and procedures that are in place in order to prevent bullying and to deal with it if and when it occurs within the school. NB Please note that the procedures set out below for dealing with allegations of abuse, in particular with regard to the instruction not to investigate, do not apply in instances of alleged bullying that are not deemed to constitute child abuse. In such cases, the procedures set out in the school's Anti-bullying policy should be followed.

WHEN DOES BULLYING BECOME A CHILD PROTECTION ISSUE?

Under the Children Act 1989 a bullying incident should be treated as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. Where this is the case, then as a school we have a duty to report the concern to the local authority children's social care.

Signs that may indicate bullying:

- Behavioural changes such as reduced concentration, becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go to school, etc
- A marked drop off in performance at school
- Physical signs such as stomach aches, headaches, difficulties in sleeping, changes in eating habits

- Appearing ill at ease in the school environment or in the company of peers, or a desire to remain with adults seeming upset, withdrawn or outraged after using phone/ tablet/ computer and unwilling to talk or secretive about online activities and mobile phone use

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN

There is concern nationally relating to a culture of misogyny and sexual harassment in many schools/colleges and the DfE and Ofsted have reviewed school procedures. As a response, all school/colleges should include a statement on the School's/College's website that gives information on reporting concerns or abuse using the new Government helpline and email address. Schools/colleges should have clear mechanisms for students to report concerns within school/college that are signposted and prevalent.

Keeping Children Safe in Education 2021 sets out how our College will manage reports of child-on-child sexual violence and harassment. That part of the guidance also links through to a further Department for Education (DfE) advice document from September 2021: 'Sexual violence and sexual harassment between children in schools and colleges'. This document is read and understood by DSLs and referred to as needed, particularly if a report of child-on-child sexual violence or sexual harassment is made.

If a report is made, the designated safeguarding lead will lead how the report is dealt with, given the high-profile nature of the report. This will be in liaison with the Principal. Where the DSL is unavailable, a Deputy DSL will lead. On a case-by-case basis, there will be consideration made as to the gender of the DSL or Deputy, so that the victim feels comfortable with how the investigation is managed.

When it comes to action to manage the report, the needs and wishes of the victim will take centre stage. Considerations should include how the investigation proceeds and what support the victim requires.

Sexual violence and sexual harassment are not acceptable and will not be tolerated. Reports will not be passed off as banter or part of growing up.

Where a report of rape, assault by penetration or sexual assault is made, children's social care and the police will be informed. Before doing so, this will be discussed with the victim and their parents/carers, explaining why it is important for other agencies to know and how these agencies will be able to support the victim. Other allegations will be managed within the College and/or with support from children's social care providers.

The guidance and the DfE advice set out the steps the College will take to manage the students involved, including risk assessments, separating the students in lessons, investigating the report, and supporting the victim and alleged perpetrator

ONLINE SAFETY

It is recognised by Oxford International College that the use of technology presents challenges and risks to children and adults both inside and outside of college. The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation, radicalisation and sexual predation: technology often provides the platform that facilitates this harm. The school endeavours to protect and educate students and staff in their use of technology and establish mechanisms to identify, intervene in and escalate any concerns where appropriate. The DSL has overall responsibility for online safeguarding within the College.

As summarised by KCSIE September 2021, the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **CONTENT:** being exposed to illegal, inappropriate or harmful material: 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 purposes;
- **CONDUCT:** personal online behaviour that increases the likelihood of, or causes, harm: for example, making, sending and receiving explicit images (eg, 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 or financial scams.

E-safety falls within the broader context of Safeguarding, and issues relating to e-safety at Oxford International College are therefore the responsibility of the Designated Safeguarding Lead, who will work closely with colleagues such as our IT Manager, the Head of Boarding and the members of staff who have designated roles in respect of safeguarding and child protection. Given the rapid developments in technology, apps and young people's behaviour online, online safety is reviewed regularly to ensure we are reflecting on and addressing the current risks students face.

The school has detailed advice and guidance contained within its e-Safety policy including monitoring and filtering of the school's service and clear guidance on mobile technology. Students are taught how to keep themselves safe online and when accessing remote education, and regular updates and reminders are provided, both to students and to parents. The provision for teaching about online safety comes mainly via the PSHE curriculum, Form time and assemblies, and updates from the DSL and Pastoral leads via email, Teams, and one-to-one conversations.

The DfE guidance, Teaching Online Safety in Schools outlines how schools can ensure their pupils

understand how to stay safe and behave online. Annex D of KCSIE (September 21) also provides further sources of information and support on online safety for schools, parents and children.

As schools and colleges increasingly work online, it is essential that children are safeguarded from potentially harmful and inappropriate online material. Oxford International College will ensure that appropriate filtering and monitoring systems are in place when students and staff access College systems and internet provision.

Oxford International College acknowledges that whilst filtering and monitoring is an important part of the college's online safety responsibilities, it is only one part of our approach to online safety. Students and adults may have access to systems external to the College control such as mobile phones and other internet enabled devices and technology and where concerns are identified appropriate action will be taken.

Oxford International College will ensure a comprehensive whole College curriculum response is in place to enable students to learn about and manage online risks effectively and will support parents and the wider College community (including all members of staff) to become aware and alert to the need to keep children and young people safe online.

SAFEGUARDING ISSUES

All staff should have an awareness of safeguarding issues which can put children and young people at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sexting (also known as youth produced sexual imagery) can put children in danger.

Further information around safeguarding issues can be found in KCSIE 2021 ANNEX B

MENTAL HEALTH

Within our College, we aim to promote positive mental health and wellbeing for our whole community (students, staff, parents and carers), and recognise how important mental health and emotional wellbeing is to our lives, in just the same way as physical health. We recognise that children and young people's mental health is a crucial factor in their overall wellbeing and can affect their learning and achievement. All children and young people will have varying mental health during their College career. However, some face significant life events which can seriously impact their emotional wellbeing and can include mental illness.

The Department for Education (DfE) recognises that: "Schools have a role to play in supporting the mental health and wellbeing of children" (Mental Health and Behaviour in School, 2018). Schools can be a place for all students to experience a nurturing and supportive environment that has the potential to develop self-esteem and give positive experiences for overcoming adversity and building resilience.

Schools are also a place of respite from difficult home lives and offers, positive role models and relationships, which are critical in promoting the wellbeing of all young people.

The role of College is to ensure that students can manage times of change and stress, and that they are supported to reach their potential or access help when they need it. The College also has a role to ensure that students learn about what they can do to maintain positive mental health, what affects their mental health, how they can help reduce the stigma surrounding mental health issues, and where they can go if they need help and support.

Mental health problems can be a sign or indicator of abuse, neglect or exploitation. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and they should contact the DSL.

SERIOUS VIOLENCE

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime.

These may include:

- Increased absence from school;
- Change in friendship groups/relationships with older groups or individuals;
- Signs of self-harm or unexplained injuries and changes in wellbeing;
- Significant changes in performance;
- Unexplained gifts or new possessions which may be linked to individuals associated with criminal gangs.

A range of risk factors increase the likelihood of involvement in serious violence, such as: being male; having been frequently absent or permanently excluded from school; having experienced child maltreatment and having been involved in offending (eg, theft, robbery).

All staff should be aware of the associated risks and understand the measures in place to manage these.

Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement

- www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence-and-its-criminal-exploitation-of-children-and-vulnerable-adults-county-lines-guidance
- www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines.

UPSKIRTING

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and the perpetrator can face a sentence of up to 2 years in prison. Anyone of any gender can be a victim.

SO-CALLED 'HONOUR-BASED' ABUSE (INCLUDING FEMALE GENITAL MUTILATION AND FORCED MARRIAGE)

So-called 'honour-based' Abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include

multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

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 is a form of child abuse with long-lasting harmful consequences.

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places 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 stand to face disciplinary sanctions. (KCSIE, September 2021, adds that 'it will be rare for teachers to see visual evidence, and they should not be examining pupils, 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.') KCSIE (September 2021) Para 40 states: '

NB, however, that the duty does not apply in relation to 'at risk' or suspected cases (i.e. where the teacher does not 'discover' that an act of FGM appears to have been carried out through disclosure, or in cases where the woman is 18 or over). In these cases, teachers should follow the school's safeguarding procedures. Further information on when and how to make a report can be found through the following link:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

CHILD ABDUCTION AND COMMUNITY SAFETY INCIDENTS

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child, and can be committed by parents or other family members, people known to the victim, and by strangers. Community safety incidents are incidents in the vicinity of the school which raise concerns, eg, people loitering nearby or unknown adults engaging children in conversation. In relation to these issues, our aim is to build students' confidence and give them practical advice on how to keep themselves safe, including advice from the local police where appropriate.

CHILDREN AND THE COURT SYSTEM

Children are sometimes required to give evidence in criminal courts (either for crimes committed against them or for crimes they have witnessed). Making child arrangements via the family courts following separation can also be stressful for children. In both cases, we will support children and families as much as possible and refer to the age appropriate guides available for this purpose (see KCSIE, September 2021).

CONTEXTUAL SAFEGUARDING

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse. Additional information regarding contextual safeguarding is available here: <https://contextualsafeguarding.org.uk/about/what-is-contextual-safeguarding>

CHILDREN MISSING FROM EDUCATION (CME)

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may involve sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

CHILD SEXUAL EXPLOITATION (CSE) AND CHILD CRIMINAL EXPLOITATION (CCE)

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 noted exploitation as well as being physical can be facilitated and/or take place online.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being.
- children who misuse drugs and alcohol.
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

The above 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.
- Government Guidance: Child sexual exploitation: guide for practitioners

COUNTY LINES

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, colleges, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts

and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

DOMESTIC ABUSE

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour.

Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act) Further information can be found in KCSIE 2021 ANNEX B.

CYBERCRIME

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s or college’s
- computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network
- or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately

stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NSPCC-when to call the police' and National Cyber Security Centre - [NCSC.GOV.UK](https://www.ncsc.gov.uk)

HOMELESSNESS

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

SHARING OF NUDES AND SEMI-NUDES (ALSO KNOWN AS SEXTING OR YOUTH PRODUCED SEXUAL IMAGERY)

The 'sharing of nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices (eg, Apple's AirDrop which works offline). Alternative terms used by young people may include 'dick pics' or 'pics'. Professionals may refer to 'youth produced sexual imagery' or 'sexting' (though note that some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images). The legal term for youth produced sexual imagery or 'youth involved' sexual imagery is indecent imagery.

The sharing of nudes and semi-nudes is illegal: by sending an explicit image, a young person is producing and distributing child abuse images, and therefore risks being prosecuted, even if the picture is taken and shared with their permission. The sharing of nudes and semi-nudes leaves students potentially very

vulnerable: the sender has no control over the images. They may be stored or shared online with any number of others. Although they can be deleted on social media or they may appear to last only a few seconds on apps like Snapchat, images can still be saved and copied by others and they may be found at any point in the future. This may lead to embarrassment, emotional distress, bullying and increased vulnerability to blackmail and exploitation. Although the production of nudes and semi-nudes will likely take place outside of school, sharing can take place and issues are often identified or reported in school. We will respond to instances of sharing of nudes and semi-nudes by investigating swiftly, fully and by following the guidance set out by the UK Council for Internet Safety (UKCIS, December 2020), to make sure our students are safeguarded, supported and educated.

SEXUAL VIOLENCE OR HARASSMENT

Sexual violence or harassment can occur between two students of either sex. It can also occur through a group of children sexually assaulting or harassing a single student or group of students.

Sexual violence includes:

- rape;
- assault by penetration;
- sexual assault – intentionally touching another person in a way that is sexual.

Sexual harassment is defined as ‘unwanted contact of a sexual nature’ that can occur online or offline.

Sexual harassment is likely to violate a student’s dignity, and/or make a student feel intimidated, degraded or humiliated, and/or create a hostile, offensive or sexualised environment.

Examples of sexual harassment include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; • sexual “jokes” or taunting
- physical behaviour such as: deliberately brushing against someone, interfering with someone’s clothes (which could also cross a line into sexual violence) and displaying pictures, photos or drawings of a sexual nature and
- online sexual harassment, which may include :
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (see, ‘Sharing of nudes and semi-nudes’)
- sharing of unwanted explicit content
- upskirting (which is a criminal offence, see section ‘Peer on peer abuse’)
- sexualised online bullying or unwanted sexual comments and messages, including on social media
- sexual exploitation; coercion and threats

Harmful sexual behaviours are abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ difference in age or if one of the children is pre-pubescent and the other is not.

Oxford International College is fully aware of its duty to safeguard and promote students’ welfare in relation to sexual harassment and abuse. The College does this by working hard to foster healthy and respectful relationships between boys and girls through a programme of education.

Within these programmes the College will tackle issues such as:

- healthy and respectful relationships;
- what respectful behaviour looks like;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- that sexual violence and harassment is always wrong;
- addressing cultures of sexual harassment.

The reporting/investigating of any incidents should be done according to the information found in the practical guidance for staff . In addition, a log is kept by the DSL of all incidents of harmful sexual behaviour so that potential patterns of concerning, problematic or inappropriate behaviour (or locations) can be identified, including whether there are wider cultural issues within the school. This information is then used to review policies, teaching and training to minimise the risk of it happening again.

DfE advice for schools on how to prevent and response to reports of sexual violence and harassment between children can be found here:

assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

HOW ALLEGATIONS WILL BE DEALT WITH BY THE SCHOOL:

- Where we have reason to suspect that a student may be suffering, or is likely to suffer, significant harm as a result of the actions of another student (or students), whether this be in or outside of school or in a boarding context, advice will be sought from children's social care as a matter of urgency, and a referral made as soon as possible thereafter if this is the advice received.
- Any possible abuse by one or more students against another student will be referred to children's social care, though we may start by making a no-names consultation in the first instance to help us determine the most appropriate course of action.
- All allegations and investigation notes will be kept on the schools CPOMS system.

We will consider every report of sexual violence and/or sexual harassment on a case-by-case basis, considering the criteria set out in paragraph 448 of KCSIE (September 2021).

KCSIE states that there are four likely scenarios for the schools to consider when managing any reports. In summary, these are:

- Manage internally;

- Early help;
- Referral to children's social care;
- Reporting to the police. The information in KCSIE (September 2021) paragraph 452 will be used to decide which of these options is most appropriate in each case.

HOW THE SCHOOL WILL SUPPORT VICTIMS, PERPETRATORS AND ANY OTHER CHILD AFFECTED BY PEER ON PEER ABUSE:

- In the event of any disclosure about student on student abuse, all the children involved, whether alleged perpetrator or victim, must be treated as being 'at risk', and this needs to inform the school's handling of the situation.

There are a number of external agencies, which can help and support victims of sexual violence and harassment:

- Dedicated NSPCC helpline 0800 136 663 The new helpline will provide both children and adults who are potential victims of sexual abuse in schools with the appropriate support and advice. This includes how to contact the police and report crimes if they wish. The helpline will also provide support to parents and professionals.
- The specialist rape and sexual violence abuse service for Sussex will be provided by Survivors Network: To make a referral online: www.survivorsnetwork.org.uk or by email: referrals.sn@survivorsnetwork.cjism.net or call: 01273 203380.

For general enquiries email info@survivorsnetwork.org.uk or for further information:

- National Domestic Abuse Helpline, run by Refuge Freephone the 24-hour , on 0808 2000 247
- the Rape Crisis national freephone helpline on 0808 802 9999 (12-2.30pm and 7-9.30pm every day of the year)
- Childline <https://www.childline.org.uk>. Tel: 0800 1111

PREVENTING RADICALISATION

The Counter-Terrorism and Security Act 2015 places a duty on schools, in the exercise of their functions, to have due regard to the need to prevent students in their care from being drawn into extremism and terrorism ('the Prevent duty'). Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is 'the vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of people with different faiths and beliefs.' The definition also includes 'calls for the death of members of our armed forces in this country and overseas'. Terrorism is an action that endangers or causes serious violence to a person/people, property or electronic systems.

The rejection of all forms of intolerance and extremism is wholly in keeping with our school ethos and approach, of which one of the central tenets, as expressed in our Curriculum Policy, is 'to promote a broad, tolerant and open-minded understanding of the world around us, including an appreciation of the democratic process and precluding the promotion of partisan political views in the classroom, in extra- and co-curricular activities, or in any other aspect of the school's activities'.

Our Curriculum Policy goes on to say that 'the active promotion of the fundamental values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of others, including those with different faiths and beliefs, has long been deeply embedded in our school's ethos and in our day-to-day practice, both in and out of the classroom'.

In line with government guidance, we see the Prevent Duty as being an integral part of our duty of care and of our Safeguarding responsibilities towards our students. Just as we need to be vigilant about signs of possible physical, emotional, sexual and other types of abuse or neglect, so we need to be alert to signs of any of our students being at risk of being radicalised or drawn into extremism.

During the process of radicalisation, it is possible to intervene to prevent vulnerable people from being radicalised. Any such concerns must, therefore, be reported without delay to the DSL. The DSL (who is also the school's Prevent lead) will then seek advice from the relevant body, which may be the Front Door For Families (FDFF) children's social care department or the local authority Prevent Co-ordinator, in order to form a view on whether the issue needs to be reported to the local Channel team. If, after such consultation, it is decided that a report needs to be made, then the DSL will do so forthwith.

Keeping children safe from risks of terrorist exploitation via social media is also an integral part of our efforts to safeguard children from other forms of online abuse and is therefore addressed in our school e-Safety policy.

We consider, given our College ethos and the values espoused by the great majority of our students and their families, that the risk of any of our students being drawn into radicalisation and extremism is comparatively low. That said, we want to avoid any risk of complacency in assuming that it cannot ever happen here. We will therefore remain vigilant and pro-active through:

- Continuing to foster and promote our college ethos, which has always been predicated on tolerance, open-mindedness and mutual respect, and infusing these values in all aspects of our school life;
- Assessing the risk of any of our students being radicalised or drawn into extremism and taking early action, eg, by reporting the issue to the Front Door For Families (FDFF) children's social care department and to the local Channel team, where we feel that a child may be at risk;
- Protecting our students from being drawn into extremism by having robust safeguarding policies and procedures that explicitly address these issues;
- Keeping abreast of policies, procedures and guidance issued by the local authority and working in partnership with the local authority agency, the local Channel team and other agencies as appropriate to fulfil our Prevent responsibilities;
- Taking steps to ensure that our staff have the necessary training, knowledge and confidence to identify children who may be at risk of being drawn into extremism and to challenge extremist ideas if and when they should arise in College
- Making sure that the teaching and presentation of political ideas in any aspect of school life is always balanced and fair-minded;
- Taking care to ensure that external speakers who are invited to speak in school, and any third parties that may wish to hire our school premises, are suitably vetted and supervised to ensure they do not use these opportunities to promote or advocate extremist views or to speak in support of terrorist organisations or activity;
- Doing all we can to ensure that our students are safe from terrorist and extremist material online when accessing the Internet at school. Some possible indicators of vulnerability to radicalisation:
 - family tensions
 - a sense of isolation
 - experience of racism or discrimination
 - feelings of failure and inadequacy or of being an outsider in society or friendship groups, etc.

Signs that a young person may be being drawn to extremism or radicalisation There is no single way of identifying an individual who is likely to be susceptible to an extremist or terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Young people at risk of radicalisation may display different signs or seek to hide their views. Staff need to use their professional judgement in identifying students who might be at risk of radicalisation and act proportionately. It is nevertheless helpful to bear in mind that those in the process of being radicalised may show some or all of the following signs.

They may:

- become involved with a new group of friends;
- search for answers to questions about identity, faith and belonging;
- possess extremist literature or advocate violent actions;
- change their behaviour and language;
- seek to recruit others to an extremist ideology.

As ever, it is important to bear in mind that there may be other reasons for some of the behaviours listed above, such as alcohol or drug abuse, family breakdown, domestic abuse, bullying, etc. It is important, therefore, to be cautious in assessing these factors in order to avoid inappropriately labelling or stigmatising individuals because they may possess a particular characteristic or fit a particular profile.

Government guidance on the Prevent Duty expressly says that even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. It also makes clear that the Prevent duty does not require teachers to carry out unnecessary intrusion into family life but, as with any other safeguarding risk, they must take action when they observe behaviour of concern. If a student is considered to be at risk of radicalisation If a member of staff should have reason to think that a student may be at risk of radicalisation, s/he must report their concerns without delay to the DSL (who is also the Prevent Lead) or to one of the other designated staff. The DSL will consult with the local Prevent team and follow their advice on how to proceed. This may result in a referral to the local Channel programme.

CHANNEL

Channel focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn to terrorism. It provides a mechanism for schools to make referrals if they are concerned about an individual being vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Further information and guidance. The government's 'Educate against Hate'

website is a good source of information and guidance for staff and parents.

(<http://educateagainsthate.com/governors/>).

ACTION TO BE TAKEN IF A STUDENT IS MISSING FROM SCHOOL

An unexplained absence from a student is always cause for concern, and a child missing from school maybe a warning sign to a range of safeguarding issues, including neglect, sexual abuse and child sexual and criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of traveling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. If the school notices prolonged or repeated absence, or particular patterns of absence, with no satisfactory explanation, its normal procedures (as set out in our policy on 'Attendance and Unauthorised student absence') will be put into effect in order to make contact with the student and/or his or her parents or guardians, to ensure that the student is safe and that we know where s/he is and the reason for the absence.

As directed by Keeping Children Safe in Education 2021, the school will hold two emergency contacts for each student on roll. If we are still unable to locate a student who is absent without a known explanation, or if we start to see, in the case of a particular student, a pattern of unexplained absences developing overtime to an extent that raises concern, then the matter will be discussed with Senior Locality Social Worker to seek advice on the most appropriate course of action. The school will also inform the local authority of any student who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 days or more. 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 school 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 the police and welfare officers as appropriate. The school is aware of, and will implement in full, the requirements of the statutory guidance for children and young people who are missing from homeand/or from education which can be found at <https://www.gov.uk/government/publications/children-missing-education>

We will inform the People Tracking Officer at the local County Council of any student who is going hire County Council of any student who is going to be deleted from our school Admissions Register where s/he:

- has been taken out of school by her/his parents and the school has received written notification from the parent that s/he is being educated outside the school system, eg, home education
- has ceased to attend school and no longer lives within reasonable distance of Brighton;
- has been certified by a relevant medical practitioner as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither the student nor his/her

parent(s) has indicated the intention to continue to attend this school after ceasing to be of compulsory school age; 28

- is in custody for a period of more than four months due to a final court order and we as a school do not reasonably believe s/he will be returning to the school at the end of that period; or,
- has been permanently excluded.
- In accordance with the recommendation of KCSIE (September 2021), if a parent expresses their intention to remove their son/daughter from the school 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.

PROMOTING AWARENESS OF SAFEGUARDING ISSUES AMONG STUDENTS

The curriculum and pastoral systems at Oxford International College are designed to foster the spiritual, moral, social and cultural (SMSC) development of all our students. Teaching staff and staff with pastoral responsibilities play a key role in helping to ensure that students relate well to one another, that they feel safe and comfortable in the school environment and that there is a spirit of openness in which students are aware that they have access to a wide range of staff and other adults.

These include the School Nurse and, in the case of boarders, the Independent Listener, with whom they can share any concerns that they may have. We aim to ensure that all students know that their concerns will be treated seriously and that they can safely express their views and give feedback.

Systems are in place to promote this, including regular questionnaires, discussions (e.g. in assemblies, House Meetings, School Council, etc). Posters displayed around the school site provide easily understood and accessible information about how students can report concerns and access support. All staff at Oxford International College are expected to lead by example and to play a full part in the collective effort to promote an awareness, which is appropriate to their age, among all students of issues relating to health, safety and well-being.

All staff at Oxford International College are expected to lead by example and to play a full part in the collective effort to promote an awareness, which is appropriate to their age, among all students of issues relating to health, safety and well-being. Staff also have a responsibility to maintain a spirit of tolerance, mutual support and open communication within the school and to ensure that bullying is kept at bay and that the school's anti-bullying policy is applied whenever the need arises. We expect the development of SMSC to be integral to the taught curriculum in most subjects. Personal Social, Health and Economic (PSHE) lessons, including covering relevant issues through Relationships Education and Sex Education (see also RSE policy), assemblies and contributions from invited outside speakers provide specific and regular opportunities for discussion of moral and social issues, on what may constitute appropriate / inappropriate behaviour and on safeguarding issues. The teaching of online safety, with the aim of helping students to develop an awareness of the risks involved in the on-line environment and of how to use it safely, is an important part of our curriculum. We listen to our students and involve them when reviewing policies such as the anti-bullying policy, or when considering how we can better address issues of equality in a school context. All bullying, including cyber-bullying, prejudiced-based and discriminatory bullying, is taken very seriously and we aim always to deal with any instances that may arise pro-actively, sensitively and promptly – and in a way that is designed to raise awareness and to help with the personal development not only of those directly concerned but also their peers and the broader student community.

THE USE OF SCHOOL PREMISES FOR NON-SCHOOL ACTIVITIES

If Oxford International College facilities or premises are hired or rented out to organisations or individuals in order to provide services or activities which are not under the direct management of school staff, assurance will be sought that the body concerned has the appropriate safeguarding and child protection policies and practices in place. Arrangements will be made to liaise with the College on these matters where appropriate. Safeguarding arrangements will be included in any lease or hire agreement as a condition of use and occupation of the premises, and failure to comply with this will lead to a termination of the agreement.

PROCEDURES FOR DEALING WITH DISCLOSURES OR ALLEGATIONS OF ABUSE

. If a member of staff is made aware of any allegation of abuse, or if knowledge of possible abuse comes to his/her attention, it is his/her duty to listen to the student, to provide re-assurance that the student is being taken seriously and that they will be supported and kept safe, and to record the student's statements - but not to probe or put words into the student's mouth.

On hearing an allegation of abuse or complaint about abuse directly from a student, a member of staff should limit questioning to the minimum necessary for clarification. Leading questions should be avoided. No inappropriate guarantees of confidentiality should be given: the student should be told that the matter will be referred in confidence to the appropriate people in positions of responsibility. The member of staff should make and submit an accurate written record and inform the DSL or one of the other Designated Staff immediately so that appropriate agencies can be informed within 24 hours and the matter resolved without delay.

The DSL will refer all allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering or is likely to suffer significant harm to the Front Door For Families (FDFF) children's social care department as soon as possible, and in any case within 24 hours.

In all cases, the member of staff receiving the disclosure / allegation may choose to contact the Front Door For Families (FDFF) children's social care department directly. Keeping Children Safe in Education makes clear that 'anybody can make a referral'. Contact details for the Front Door For Families (FDFF) children's social care department, including an out of hours emergency contact number, are given at the end of this document.

Where there is a safeguarding concern, the child's wishes and feelings will be taken into account as far as possible when determining what action to take and what services to provide.

See below for details of an allegation against a member of staff or volunteer at the school or any other person in a position of trust.

STAFF BEHAVIOUR AND CODE OF CONDUCT

The nature of the interactions between staff and students is central to the ethos at Oxford International College. At the heart of this ethos lie trust, mutual respect and an emphasis on being true to oneself and on encouraging open and honest communication. We want this to be a school community that values and promotes individuality, enthusiasm and personal commitment, and flexibility. We want to get to know our students and to work with them as individuals, each with her or his own personality, talents, interests, needs and aspirations. However, staff need to take care to ensure that their behaviour does not inadvertently lay them open to allegations of abuse.

Our Code of Conduct for staff is designed to accommodate and promote this ethos while ensuring that our working practices are thoughtful and well-considered and that they are designed with the safety and protection of staff and students in mind.

MAKING A PROFESSIONAL JUDGEMENT

It is important to stress that this guidance cannot provide a complete checklist of what is or is not appropriate behaviour for staff in all circumstances. There may be occasions and circumstances in which staff members may have to make decisions or take action in the best interests of a child or young person which could contravene the guidance given in this Code, or where no guidance exists. In such circumstances, judgements and actions taken should always be recorded and shared with a senior member of staff as soon as possible after the event. At all times, members of staff are expected to make judgements about their behaviour in order to secure the best interests and welfare of the children in their charge. They should always consider whether their actions are warranted, proportionate and safe, and whether they are applied equitably.

PROPRIETY AND BEHAVIOUR

All staff in a school have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children and young people. It is therefore expected that members of staff at Oxford International College will adopt high standards of personal conduct in order to maintain the confidence and respect of the public in general and all those with whom they work.

Staff should be aware that safe practice also involves using judgement and integrity about behaviours in contexts other than the work place. There may be times, for example, when an adult's behaviour or actions in their personal life may come under scrutiny from local communities, the media or public authorities. This could be because their behaviour is considered to compromise their position in the workplace or to indicate an unsuitability to work with children or young people. Misuse of drugs, alcohol

or acts of violence would be examples of such behaviour. All staff are required to adhere to the Acceptable Use of IT Policy for Staff.

POSITION OF TRUST

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education are in positions of trust in relation to the young people in their care. It is an offence under section 16 of the Sexual Offences Act, 2003, for a person in a position of trust, such as a teacher, to engage in a sexual relationship with a young person under the age of 18 even if, in the case of those over the 16, the relationship is consensual. Oxford International College policy goes beyond this in stating that members of staff must not under any circumstances engage in a relationship with any student at Oxford International College regardless of whether or not they are under the age of 18. Failure to adhere to this policy would result in the school's disciplinary procedures being invoked. Staff must take all reasonable steps to ensure that their actions and behaviour do not place them or students at risk of harm or of allegations of harm to a student. Interactions and communications between staff and students at Oxford International College should remain professional in nature at all times.

COMMUNICATION WITH STUDENTS

Communications with students must always be professional in nature and in motivation. Staff should not write personal messages to students in any medium – including letters, notes, text messages, emails, messages left on social networking websites, etc. They should not accept students as friends on social media. Staff should also not communicate with students using text messages, or give their personal mobilephone numbers or personal email addresses to students, unless there is a demonstrably valid professional reason for doing so. Communication with students should not be from a personal phone or email address: if a member of staff needs to contact a student by telephone or email, s/he should do so using a school telephone and/or the Oxford International College's email system. The group leader on all school trips and visits involving an overnight stay should take a school mobile phone with him/her and may ask the students for their mobile numbers before allowing them out in small, unsupervised groups. The school mobile should be used for any contact with students that may be necessary. The group leader must then delete any record of students' mobile phone numbers at the end of the trip or visit and should ensure that students delete any staff numbers that they may have acquired during the trip.

ONE-TO-ONE SITUATIONS

Members of staff at Oxford International College are likely to find themselves in one-to-one situations with a student from time to time. In our Sixth Form in particular, one-to-one meetings between students and their Director of Studies (who is their personal and academic tutor) are a key feature of our pastoral and

mentoring approach. In addition, teaching staff at Oxford International College will often take the time to give extra support to a student who needs it; there are some instances where a subject may need to be taught in one-to-one lessons; the Pastoral tutors may need to see students in private as, from time to time, as may Houseparents and other staff with pastoral responsibilities. We all have a responsibility to ensure that our behaviour is totally beyond reproach, and that it is not likely inadvertently to lay us open to allegations of abuse. It is good practice to: avoid one-to-one meetings with students in remote or secluded areas of the school; wherever possible, ensure that others are within earshot; use a room with a visual panel and / or leave the door open (unless there are good reasons why the conversation has to be had in confidence); avoid the use of 'Engaged' or equivalent signs, as they may create an opportunity for secrecy or the interpretation of secrecy. It is important always to report to a member of the designated safeguarding team any one-to-one situation in which a student may show signs of becoming uncomfortable or ill at ease (see also section 'Low level concerns'). Pre-arranged meetings with students away from the school premises are not permitted unless approval has obtained from their parent and the DSL or other senior colleague with delegated authority.

PHYSICAL CONTACT WITH STUDENTS

There are occasions when it is entirely appropriate and proper for staff to have physical contact with students, but it is crucial that they do so only in ways which are appropriate to their professional role. Staff should, therefore, use their professional judgement at all times. Staff should not have unnecessary physical contact with students and should be alert to the fact that minor forms of friendly physical contact can be misconstrued by students or onlookers. A member of staff can never take the place of a parent in providing physical comfort and should be cautious of any demonstration of affection. Physical contact should never be secretive, or of the gratification of the adult, or represent a misuse of authority. If a member of staff believes that an action could be misinterpreted or that it may have been misinterpreted, s/he should record the incident and circumstances and inform the DSL or one of the other colleagues with designated responsibility who will advise on the best course of action in the circumstances.

PHYSICAL RESTRAINT

Any physical restraint is only permissible when a child is in imminent danger of inflicting an injury on himself/herself or on another, and then only as a last resort when all efforts to diffuse the situation have failed. Another member of staff should, if possible, be present to act as a witness. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the DSL who will decide what to do next. Please refer the College Physical Restraint Policy for more detailed information.

Physical education and other activities requiring physical contact Where exercises or procedures need to be demonstrated, great caution should be used if the demonstration involves contact with students and,

wherever possible, contact should be avoided. It is acknowledged that some staff, for example, those who teach PE and games, or who offer music tuition, will, on occasions, have to initiate physical contact with students in order to support a student so they can perform a task safely, to demonstrate the use of a particular piece of equipment/instrument or assist them with an exercise. This should be done with the student's agreement. Contact under these circumstances should be for the minimum time necessary to complete the activity and take place in an open environment. Staff should remain sensitive to any discomfort expressed verbally or non-verbally by the child.

TRANSPORTING STUDENTS

It is inadvisable for a member of staff to give a lift in a car to a student alone. Wherever possible and practicable it is advisable that transport is undertaken other than in private vehicles, with at least one adult additional to the driver acting being present. That said, there will inevitably be circumstances in which a member of staff, in their professional capacity and in the normal course of their duties, is required to transport a student unaccompanied in a car. It is not unusual, for instance, in cases where a boarding student needs to move from one host family to another for one of the colleagues from the Boarding Office to help them do so. Another example may be a member of the PE department needing to accompany a student to A&E following a sporting injury. In all such situations, the journey should be made known to a senior member of staff and a note made of the journey, its purpose and the time, date and destination.

The member of staff concerned should retain this note in case it needs to be referred to at a later date.

CONFIDENTIALITY

Staff members should never give absolute guarantees of confidentiality to students or adults wishing to tell them about something serious. They should guarantee only that they will pass on information to the minimum number of people who must be told in order to ensure that the proper action is taken to sort out the problem and that they will not tell anyone who does not have a clear need to know. They will also take whatever steps they can to protect the informing student or adult from any retaliation or unnecessary stress that might be feared after a disclosure has been made. Staff may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances they may have access to, or be given, highly sensitive or private information. These details must be kept confidential at all times and shared only when it is in interests of the child to do so. Such information must not be used to intimidate, humiliate, or embarrass a child or young person concerned. It should never be shared casually in conversation or passed to any person other than on a strictly need-to-know basis. There may be circumstances in which a member of staff may be expected to share information about a child, for example if abuse is suspected. In such cases, staff have a duty to pass such information on without delay, but only to those with designated responsibilities for child protection.

PHOTOGRAPHY AND VIDEOS

Many College activities involve the taking or recording of images. Any such work should take place with due regard to the law and the need to safeguard the privacy, dignity, safety and wellbeing of students. Informed consent from parents and agreement from the student should always be sought before an image is taken for any purpose. Careful consideration should be given to the question of how these activities are organised and undertaken. Care should be taken to ensure that all parties understand the implications of the image being taken, especially if it is to be used for any publicity purposes or published in the media or on the Internet.

Staff should:

- Act in accordance with the College's Taking, Storing and Using Images of Children Policy;
- Be clear about the purpose of the activity and what will happen to the images when the lesson/activity is concluded;
- Ensure that a senior member of staff is aware of the use and its purpose;
- Avoid making images in one-to-one situations, or ones which show a single child with no surrounding context;
- Ensure students are aware that they are being photographed and that they have agreed to this; also that they understand why the images are being taken, and that they are appropriately dressed;
- Use only equipment provided or authorised by the College
- Any photographs involving students taken on an authorised personal device should be deleted from the personal device as soon as they have been downloaded onto the College system;
- Seek permission from parents where appropriate;
- Remain sensitive to any students who, for whatever reason, appear uncomfortable and recognise the potential for such activities to raise concerns or lead to misunderstandings.
- Be able to justify any images of children in their possession. It is totally unacceptable for any member of staff to take photographs of students for their personal use.

ACTIVELY PROMOTING FUNDAMENTAL BRITISH VALUES

In common with all schools, we are required to 'actively promote the fundamental British values of democracy, the rule of law, individual liberty and respect and tolerance for others, including those with different faiths and beliefs'. We also need to be able to demonstrate that we do this. These values are entirely in keeping with the ethos at Oxford International College and should therefore be inherent in everything that we do. Nevertheless, it is important always to bear these in mind and to ensure that they infuse every aspect of our school life, in the classroom, in extracurricular activities, etc.

THE PREVENT DUTY

The Counter-terrorism and Security Act 2015 places a duty on schools to take active steps to prevent their students from being radicalised or drawn into extremism and terrorism. In line with government guidance, we consider our responsibilities under The Prevent Duty to be part of our broader responsibilities to safeguard and promote the welfare of our students. To this end, a concern that a student is at risk of being radicalised or drawn into extremism should be treated in exactly the same way as a concern relating to physical, emotional, sexual or any other sort of abuse. Such concerns must be communicated at a very early stage to the DSL or any of the other staff with designated responsibility for child protection. We also have a duty to ensure that any speakers we invite to speak in school are suitably vetted in advance, and supervised while they are speaking or otherwise interacting with students, to ensure that such talks can never present an opportunity for extremist or partisan views to be promoted in our school.

A NON-PARTISAN APPROACH TO POLITICAL, ETHICAL AND RELIGIOUS ISSUES

A healthy understanding of the world around us is an important part of the educational experience that we want to provide for our students. In doing so, the emphasis should always be on open-mindedness, tolerance and critical evaluation – encouraging students to appreciate that, where moral, ethical, religious or political questions are concerned, there is always likely to be a multiplicity of viewpoints, and stressing the need to respect the views of others. When such issues arise, in subject teaching or in the context of co-curricular or extracurricular activities (such as Debating Club) staff must always ensure that they offer a balanced presentation of opposing views which precludes the promotion of partisan (ie, one-sided) opinions or dogma. ISI guidance also stipulates that ‘pupils should not be actively encouraged by teachers or others to support particular political viewpoints’.

ALLEGATIONS AGAINST A MEMBER OF STAFF

Dealing with an allegation of abuse against a member of staff.

This section sets out the school's policy in any case in which it is alleged that a member of staff has:

- behaved in a way that has harmed a child, or that 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 that he or she 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. KCSIE (September 2021) gives detailed guidance on how schools should deal with allegations of abuse by teachers and other staff. We would, of course, be guided by this if and when such a situation arose. The following is a summary of the salient points.

An allegation of abuse made against a member of staff will always be treated with the greatest care. Our response has to be considered and sensitive to all parties. It must aim for a quick resolution to the benefit of all concerned, avoiding all unnecessary delays. It must also aim to strike a balance between the need to protect children from abuse on the one hand, and the need to protect staff from false or unfounded accusations on the other. An allegation may be received in one of various ways: it may be a direct complaint made by a student or a parent to another member of staff or directly to a relevant external agency; it may come from another party that may have been told about or witnessed abuse; or it may come as an anonymous referral. If a member of staff is informed about a possible allegation, s/he should immediately report the matter to the Principal, who will discuss it with the LADO (Local Authority Designated Officer) as soon as possible and, in any case, within 24 hours of receiving the allegation.

In the absence of the Principal, the matter should be reported to the Chair of the Board of Governors, who will seek to report the allegation to the Principal at the earliest possible opportunity and assume responsibility for contacting the LADO if the Principal is unavailable.

If the member of staff feels that there is a conflict of interest in reporting the matter to the Principal, they should report it directly to the LADO.

If the allegation is against the Principal, then it must be reported directly to the Chair of the Board of Governors (see below for contact details) without informing the Principal first. The Chair will inform the LADO as soon as possible.

If the Chair cannot be contacted immediately, the allegation should be reported directly to the LADO (contact details below).

WHAT HAPPENS NEXT?

Each situation will be assessed on its own merit and with due regard to the welfare of the child in question while at the same time supporting the person who is the subject of the allegation. Under no circumstances should the school's senior management, or indeed any member of staff at the school, conduct their own investigation without prior consultation with the LADO or, in more serious cases, the police, so as not to jeopardise statutory investigations. The timescale required to deal with a particular issue will depend on the nature, seriousness and complexity of the allegation. However, in all cases, the aim will be to try resolve the issue as quickly as possible while, of course, ensuring a fair and thorough investigation. All allegations will be investigated as a priority and without delay. If, after initial consideration and discussion with the LADO, it is concluded that the allegation does not involve a possible criminal offence, it will be for the school to deal with it. This will be done quickly and with due regard to the school's disciplinary procedures. We will aim to follow the recommendations relating to timescales given in Part Four of 'Keeping Children Safe in Education (September 2021), which are as follows. 'For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss them with the designated officer(s). In such cases, if the nature of the allegation does not require formal disciplinary action, the employer should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.' Where further investigation is required, the nature, content and context of the allegation will be discussed with the LADO and a course of action agreed with him, including how an investigation should be carried out and by whom, whether the police should be informed, and what should be said to the individual concerned and the parents of the child / children involved.

Where the allegation concerns a member of staff, a volunteer or another student, the subject of the allegation would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. A member of staff will normally be appointed to keep the person informed of the likely course of action and the progress of the case. Where an allegation relates to a member of supply staff provided by an agency, the agency should be fully involved.

SUSPENSION

The possible risk of harm to the child needs to be effectively evaluated and managed, both in respect of the child involved in the allegations and of any other children who may be directly or indirectly involved. In some cases, this may lead the school to consider suspending the person until the case is resolved.

However, before doing so, the school will consider very carefully whether the circumstances of the case warrant the member of staff to be suspended from contact with students or whether alternative arrangements can be put in place until the allegation or concern are resolved. A member of staff will be suspended only if it is judged that there is no reasonable alternative. The advice and guidance of the LADO will always be sought in such instances.

Where the decision is taken to suspend a member of staff, the reasons and justification will be recorded and the member of staff notified of the reasons. As part of its duty of care to its staff, the school will seek to provide effective support for a colleague who may be facing an allegation. S/he will be provided with a named contact at the school if they are suspended. If a member of boarding staff is suspended pending an investigation of a child protection nature, then the school will make arrangements for the member of staff concerned to be housed away from the boarding house such that s/he will have no direct contact with students until the matter is resolved.

FALSE ALLEGATIONS

If an allegation is determined to be false or unsubstantiated, the Principal will, after conferring with the LADO, determine whether the student should be given a sanction, which could include temporary or permanent exclusion, as well as a referral to the police if there are grounds for believing that a criminal offence may have been committed. In such cases the DSL will also refer the matter to children's social care services to determine whether the child concerned is in need of help or support, or may have been abused by someone else. In the rare event that an allegation is shown to have been deliberately invented or malicious, the Principal should consider whether any disciplinary action is appropriate against the student who made it, or, if the person concerned was not a student, whether the police should be asked to consider if any action might be appropriate.

RECORD KEEPING

The outcome of investigation of an allegation will record whether it is:

- Substantiated – there is sufficient evidence to prove the allegation;
- Unsubstantiated – there is insufficient evidence either to prove or disprove the allegation. The term therefore implies neither guilt nor innocence;

- Unfounded – to reflect cases where there is no evidence or proper basis which supports the allegation being made;
- False – there is sufficient evidence to disprove the allegation; or
- Malicious – there is sufficient evidence to disprove the allegation – and that there has been a deliberate act to deceive. If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. In all other circumstances a comprehensive record of the allegation, details of how it was followed up and resolved, and a note of any action taken and decisions reached will be kept on the confidential personnel file of the member of the staff concerned, and a copy provided to him or her, in accordance with DfE advice.

REFERENCES

KCSIE (September 2021) states that ‘cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference’.

CONFIDENTIALITY AND REPORTING RESTRICTIONS

During the course of the investigation the school, in consultation with the LADO, will decide what information should be given to parents, staff and other students and how press enquiries are to be dealt with. Due consideration will be given to the provisions in the Education Act 2011 relating to reporting restrictions identifying teachers who are the subject of allegations from students. With effect from 1 October 2012, restrictions have been in place regarding the reporting or publication of any material that that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). Schools are required to make every effort to maintain confidentiality and to guard against unwanted publicity.

These restrictions apply up to the point where the teacher concerned is charged with an offence or the Secretary of State (see below) publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves.

REPORTING STAFF DEPARTURES TO THE DISCLOSURE AND BARRING SERVICE

The school is obliged, in common with all other schools in the UK, to make a referral to the Disclosure and Barring Service (DBS) if the two main conditions below are both met:

Condition 1 – Any person, whether employed, contracted, a volunteer or a student, who has been permanently removed from a regulated activity because s/he is considered unsuitable for work with

children. This would include instances of dismissal or non-renewal of a fixed-term contract; instances of re-deployment to a non-regulated activity that involves no unsupervised contact with children; instances where the school is unwilling to engage a supply teacher provided by an employment agency; the termination of the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; and resignation, retirement or voluntary withdrawal from supply teaching, contract working, a teacher training course or volunteering.

Condition 2 – The person being referred has:

- engaged in 'relevant conduct', ie, harmed, or poses a risk of harm, to a child or vulnerable adult through their action or inaction (eg, emotional, psychological, physical, sexual, neglect); or
 - satisfied the 'harm test', ie caused actual harm or presented a significant risk of harm to a child, corroborated by tangible or at least credible evidence; or
 - received a caution for, or been convicted of, a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence. A relevant offence for the purposes of referrals to DBS is an automatic inclusion offence as set out in the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009 (amended) and the Safeguarding Vulnerable Groups (Prescribed Criteria and Miscellaneous Provisions) Regulations (Northern Ireland) 2009. The school is also under a duty to refer, through the TRA, to the Secretary of State, under sections 141D and 141E of the Education Act 2002, any instance where a teacher has been dismissed (or would have been dismissed had s/he not resigned) because of serious misconduct. The Secretary of State may, following an investigation, decide to make a prohibition order in respect of that person. The reasons for such an order to be considered are 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

The address for DBS referrals is:

Disclosure and Barring Service PO Box 3961 Royal Wootton Bassett SN4 4HF.

The address for TRA referrals is:

Teacher staff Misconduct Unit Teaching Regulation Agency (TRA) 53-55 Butts Road Earlsdon Park Coventry CV1 3BH

REVIEW FOLLOWING THE CONCLUSION OF A CASE

As soon as practically possible after the conclusion of a case in which an allegation is substantiated, the DSL will review the circumstances of the case with the LADO to determine whether any improvements need to be made to the school's procedures or practice to avoid similar events from occurring in the

future. The DSL will ensure that the review is thorough and takes into account all aspects of the case and of the way in which the school dealt with it, including a review of the decision to suspend where this was the case.

LOW LEVEL CONCERNS (CONCERNS THAT DO NOT MEET THE HARM THRESHOLD)

Concerns that do not meet the harm threshold may arise in several ways and from a number of sources, eg, suspicion; complaint; disclosure made by a child, parent or other adult within or outside of the school; or as a result of checks undertaken.

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 school 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 serious enough to consider a referral to the LADO.

Examples of such behaviour could include:

- being over friendly with students;
- having favourites;
- having photographs of students on their mobile phone;
- engaging with a student on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.
- Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is very important that low level concerns are shared, to embed a culture of openness, trust and transparency in which the expected behaviour set out in the Staff Code of Conduct is lived, monitored and reinforced by all staff. This should also protect staff from potential false allegations or misunderstandings. Staff should share low level concerns responsibly with the Principal, who will collect as much information as possible by speaking directly to the person who has raised the concern, to the individual involved and any witnesses. The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken (eg, supporting the individual to correct unprofessional behaviour at an early stage, identifying any weaknesses in the school’s safeguarding system, etc).

Low-level concerns should be reported to the same persons as set out above in relation to concerns and allegations that meet the harms test.

When a low-level concern has been raised by a third party, the Principal should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses.

A record will be kept in writing of the details of the concern, the context in which the concern arose and the action taken, along with the rationale for the decisions. The name of the individual sharing their concerns should also be noted, though if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

Low level concerns should not be included in references unless they relate to issues which would normally be included in a reference, eg, misconduct or poor performance, or where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated. KCSIE (September 2021) is clear that schools should only provide substantiated safeguarding allegations in references.

Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified

Records of low-level concerns should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

Where a pattern of behaviour is identified, the school should decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

The College will review if any wider cultural issues in school that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence. The rationale for all decisions and actions taken will always be recorded.

CONTACTS/LINKS

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Chair of the Board of Governors Jonathan

Cuff Jonathan.cuff@doverbroecks.com

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Barry Armstrong

Barry.armstrong@nordanglia.com

KEY EXTERNAL CONTACTS

LADO: DESIGNATED OFFICER(S) OF THE LOCAL AUTHORITY

Darrel Clews

Local Authority Designated Officer and Covering Manager for Front Door For Families (FDFF)

Families, Children & Learning Directorate

Room RG124

Moulsecoomb Hub

North Building

Hodshrove Lane

Brighton BN2 4SE

Telephone number:

01273 295643 , 07795 335879

Email:

LADOenquiries@brighton-hove.gov.uk

FRONT DOOR FOR FAMILIES (FDFF) CHILDREN'S SOCIAL CARE DEPARTMENT (PREVIOUSLY BRIGHTON AND HOVE MULTI AGENCY SAFEGUARDING HUB (MASH))

Telephone numbers:

01273 290400 or 01273 294081

Out of hours emergency: 01273 335906

Duty team telephone number: 01273 335905

E-mail:

Gill Hibbert: gill.Hibbert@brightonhove.gov.uk

frontdoorforfamilies@brightonhove.gcsx.gov.uk

BRIGHTON & HOVE SAFEGUARDING CHILDREN PARTNERSHIP (BHSCP)

Moulsecoomb Hub

North Hodshrove Lane

Brighton,

BN2 4SE

Telephone number:

01273 292379

Email:

frontdoorforfamilies@brightonhove.gov.uk

FGM REPORTING - NON-EMERGENCY POLICE CONTACT NUMBER

Telephone

- 101

SCHOOL'S POLICE LIAISON OFFICER PREVENTION YOUTH OFFICER

PC Sasha Maddison

Telephone number:

101 Ext 550517

Email:

Sasha.Maddison@sussex.pnn.police.uk

PREVENT PARTNERS AND ADVICE ABOUT EXTREMISM

Channel Prevent Coordinator

Telephone:

01273 291115

Email:

Channel.Prevent@brighton-hove.gov.uk

Channel Police Practitioner- PREVENT

Thomas Morvantoone

Telephone number:

101 ext. 550543

Email: thomas.morvantoone@sussex.pnn.police

Channel Local Authority Lead Name: Nahida Shaikh

Telephone number:

01273 290584 or 07717303292

Nahida.Shaikh@brighton-hove.gov.uk

Non-emergency DfE advice 020 7340 7264

counter-extremism@education.gsi.gov.uk

ALL EMERGENCIES

Telephone 999

UK SAFER INTERNET CENTRE

0344 381 4772

helpline@saferinternet.org.uk

NSPCC WHISTLEBLOWING HELPLINE

Weston House

42 Curtain Road

London EC2A 3NH

Telephone: 0800 028 0285

Email: help@nspcc.org.uk

www.nspcc.org.uk/what-is-childabuse/types-of-abuse

INDEPENDENT LISTENER

The College has available an Independent Listener that students may contact:

Ianto Doyle: 07799 472170

Note:

The school will be accepting students for entry from September 2023. For registration of the school Andrew Gillespie will be Acting Principal.

We will be recruiting a Founding Principal from January 2023 (latest) and a Designated Safeguarding Lead prior to the school opening. For opening in September 2023 we will also have Deputy Designated Safeguarding Leads in role.