



**Oxford International Study Centre**  
individually designed study programmes in the heart of Oxford

## **Child Protection Policy: Safeguarding Children and Vulnerable Adults**

### **Introduction**

The school will act in accordance with the following legislation and guidance:

- The Children Act 1989 and 2004
- Education Act 2002, section 175
- Local Authority Safeguarding Children Board procedures and guidance
- DfES guidance 'Safeguarding Children and Safer Recruitment in Education 2006
- HM Government 'Working Together to Safeguard Children 2018
- HM Government 'Keeping Children Safe in Education' 2020
- HM Government 'What to do if you're worried a child is being abused': Advice for Practitioners (March 2015)

This general Child Protection Policy is supported by, and works alongside, specialist policies to cover all areas of safeguarding. These policies should be consulted by all staff where more information is necessary, and they are referred to throughout this document.

**OISC welcomes students from a very broad range of ages. It is crucial that differentiations are made in the approach to safeguarding students of various ages, rather than adopting a 'one size fits all' policy. The 'Guidelines for Parents and Guardians of Students Under 18' outline these differentiations clearly, and should be consulted alongside this document.**

HM Government 'Working Together to Safeguard Children' (2018) requires all schools to follow the procedures for protecting children from abuse established by their Local Authority Safeguarding Children Board (LSCB).

Schools must ensure that they have appropriate procedures in place for responding where they believe that a child has been abused or is at risk of abuse. The procedures should also cover circumstances in which a member of staff is accused of, or suspected of, abuse. Schools and colleges form an important part of the multi-agency work which, when employed effectively, can help to prevent the abuse of children and vulnerable adults:

*"Everyone who comes into contact with children and their families has a role to play in safeguarding children. School and college staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. Schools and colleges and their staff form part of the wider safeguarding system for children."*  
(Keeping Children Safe in Education, 2015)

DCSF (now DfE) guidance 'Safeguarding Children and Safer Recruitment in Education' 2006 states that "All parents need to understand that schools and FE colleges have a duty to safeguard and promote the welfare of children who are their pupils or students, that this responsibility necessitates a child protection policy and procedures, and that a school or FE college may need to

share information and work in partnership with other agencies when there are concerns about a child's welfare."

OISC believes that "everyone shares responsibility for safeguarding and promoting the welfare of children and young people, irrespective of individual roles" (Working Together, 2018) and this policy has been produced in line with this belief. It should also be noted that "children can be subjected to abuse by those who work with them in any setting. All allegations of abuse or maltreatment of children by a professional, staff member, foster carer, or volunteer must therefore be taken serious and treated in accordance with consistent procedures." (Working Together, 2018). This policy aims to confirm and outline the consistency of these procedures in order to ensure a safe working and studying environment for staff and students. The key theme of this policy is that abuse and potential perpetrators cannot be categorised or identified based on any specific set of traits or beliefs; be they personal, religious, cultural or racial: staff are encouraged, without fostering an environment of negativity and suspicion, to always take the attitude that 'it could happen here' and to be vigilant to any potential signs of abuse, even where they might least expect it.

## **1. Aims of the policy**

- To provide an environment and foster a school community supportive of the aims of Oxford International Study Centre.
- To raise the awareness of both teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse
- To provide a systematic means of monitoring children known or thought to be at risk of harm
- To develop a structured procedure within the school to be followed by all members of the school community in cases of suspected abuse
- To develop and promote effective working relationships with other agencies, especially the Police, Social Care Services, and the Oxfordshire Safeguarding Children Board (OSCB), and their work through the Multi-Agency Safeguarding Hub (MASH)
- To ensure that all adults within the school who have access to children have been checked as to their suitability
- To emphasise the need for good levels of communication between all members of staff

## **2. Procedures**

Oxford International Study Centre's procedures for safeguarding children will be in line with Local Education Authority (LEA) and the LSCB procedures. The school will ensure that:

- The Designated Senior Person is Ben Llewelyn, Principal
- The member of staff who will act in the DSP's absence is Daniel Simpson, Student Services Manager
- The staff are trained to develop their understanding of the signs and indicators of abuse
- The staff know how to respond to a pupil who discloses abuse and are familiar with whistle-blowing procedures
- All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures
- Procedures are regularly reviewed and updated
- All new members of staff will be given a copy of the addendum to the teaching contract, which outlines policies on safeguarding, and of this policy, with which they are expected to ensure they continue to be familiar
- All teaching and administrative staff have completed online safeguarding training at Level 1, provided by the OSCB, as per the minimum requirements. They have, in addition,

completed in-person training at Level 2, which is offered in-house at OISC. Senior management have, in addition, completed in-person full-day safeguarding training, at Advanced (DSL) Level where appropriate.

### **3. Responsibilities**

#### **a. Responsibilities of Senior Managers**

It is the role of the senior managers to take responsibility for safeguarding and promoting the welfare of children. This responsibility requires:

- Having clear lines of responsibility
- Having effective recruitment and human resources procedures, including checking all new staff and volunteers to make sure they are safe to work with children and young people
- Having procedures for dealing with allegations of abuse against members of staff and volunteers
- Making sure that staff are appropriately training and kept informed of any significant changes to safeguarding responsibilities
- Having clearly understood and working procedures on how to safeguard and promote the welfare of young people
- Working with the child's parents to support their child's needs
- Helping parents understand that the school, like all others, has a responsibility for the welfare of all pupils and has a duty to refer cases to Social Care in the interests of the child
- Any deficiencies or weaknesses in regard to child protection arrangements to be remedied without delay
- Ensuring that children receive appropriate and timely preventative interventions when required
- Notifying the Independent Safeguarding Authority (ISA) of the name of any member of staff considered to be 'unsuitable to work' with children in accordance with statutory regulations
- Organising a formal programme of cascading training, whereby useful guidance and policy information is passed on to tutors following detailed training programmes
- Ensuring that Additional Needs Analysis forms are completed for any students believed to be at risk of any kind, or in need of additional support

#### **b. The Designated Senior Person (DSP) has the following responsibilities to:**

- Ensure that the school operates within the legislative framework and recommended guidance from the OSCB and LEA
- Liaise closely with the OSCB and ensure their guidance and information is clearly displayed on the college safeguarding wall.
- Ensure that the school effectively monitors children about whom there are concerns
- Keep written records of concerns about a child even there is no need to make an immediate referral
- Ensure that all such records are stored confidentially and securely and are separate from pupil records
- Monitor, with the Academic Manager, register attendance, and absences for all pupils; inform Social Care if a child is absent without explanation for two days if currently subject to a Child Protection Plan
- Submit reports to and attend child protection conferences and other useful training courses
- Ensure that all staff and volunteers are aware of the OSCB's Child Protection Procedures
- Ensure that appropriate training and support is provided to all staff, both in day-to-day interaction and, formally, as part of the college policy of cascading training

- Develop effective working relationships with other agencies and services, as well as other educational institutions, to compare best practice and policies
- Make appropriate use of the MASH, where necessary or desirable
- Liaise with Social Care teams over suspected cases of child abuse, having no-names consultations where necessary
- Provide guidance to parents, children and staff about obtaining suitable support
- Make a commitment to develop productive, supportive relationships with parents, whenever it is in the pupil's interests to do so
- Inform the social worker responsible where a pupil who is / or has been the subject of a child protection plan changes school, and transfer the appropriate records to the DSP at the receiving school, in a secure manner, and separate from the child's academic file

#### c. Reporting

The reporting of Safeguarding practice at Oxford International Study Centre enables the senior staff to ensure compliance with current legislation and to identify areas for improvement. Close liaison with the local authorities, most importantly the OSCB, assessment teams, early intervention services, and the MASH, is vital in order that appropriate support and training can be given. These are requirements of 'Safeguarding Children and Safer Recruitment in Education' (DfES 2006).

It is important to protect the anonymity of the children concerned and discretion should be used to avoid the identification of individuals.

## 4. Training

Summary of Child Protection Training:

- The Designated Senior Person, and the Deputy DSL, will undertake in-person safeguarding training (Designated Lead: Specialist Level) at least every two years.
- The Designated Senior Person will undertake Safer Recruitment Training at least every five years. Full information is available in the Recruitment and Selection Procedure
- The Designated Senior Person will also undertake other relevant training, including, but not limited to, training in: CSE, FGM, E-Safety.
- Teaching and other staff will undertake online safeguarding training at a minimum before beginning to work with children. All staff will undertake in-person Generalist Safeguarding training at Level 2, which is offered at least once per academic year in-house, as part of the Safeguarding Programme, to be delivered by the DSP, or another suitably-qualified person from the OSCB where necessary.

## 5. Types of Abuse

Abuse covers all forms of maltreatment of a child. Somebody may abuse 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 a stranger. They may be abused by an adult or adults, or another child or children. It is important to remember that there is no identifiable fixed category for those who abuse children, and perpetrators may be male or female, of any age. Vigilance towards all is key to a safe working environment.

### Physical abuse

Physical abuse 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 (formerly Munchausen's by Proxy).

### Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, 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, though it may occur alone.

*Please see College Abusive Behaviour Policy for more detail.*

### Sexual abuse

Sexual abuse involves forcing or inciting a child or young person to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may include non-contact activities, such as involving children in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

*Please see College Specialist Safeguarding Policy for more detail.*

### Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy 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 care-givers)
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## **6. Concerns**

All staff and volunteers should be concerned about a child if he or she:

- Has any injury which is not typical of the bumps and scrapes normally associated with an accidental injury. Diagrams outlined this have been discussed during safeguarding training, and are available to staff on request
- Regularly has unexplained injuries
- Frequently has some injuries (even when apparently reasonable explanations are given)
- Gives confused or conflicting explanations about how injuries were sustained
- Exhibits significant changes in behaviour, performance or attitude
- Indulges in sexual behaviour which is unusually explicit and / or inappropriate to his or her

- age / stage of development
- Discloses an experience in which he or she may have been significantly harmed

In addition, any other cause for believing that a child may be suffering harm should be reported.

## 7. Dealing with a disclosure

If a child discloses that he or she has been abused in some way, the member of staff or volunteer should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the child to talk freely
- Reassure the child, but not make promises which it might not be possible to keep
- Not promise confidentiality – it might be necessary to refer to Social Care or other agencies
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, rather than ask direct questions
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make a written record (see Record Keeping)
- Pass information to the Designated Senior Person without delay
- NOT allow the child to be interviewed a second time. Accept what the child says and report to the Designated Senior Person
- Question the child in line with the safeguarding training received

a. General points on how to respond to a child wanting to talk about abuse:

- Show acceptance of what the child says (however unlikely the story may sound)
- Keep calm
- Look at the child directly
- Be honest
- Tell the child you will need to let someone else know – **don't promise confidentiality**
- Even when a child has broken a rule, they are not to blame for the abuse
- Be aware that the child may have been threatened or bribed not to tell
- Never push for information. If the child decides not to tell you after all, then accept that and let them know that you are always ready to listen

b. Helpful things to say:

- I understand what you are saying
- Thank you for telling me
- It's not your fault
- I will help you

c. Things not to say:

- Why didn't you tell anyone before?

- I can't believe it!
- Are you sure this is true?
- Why? How? When? Who? Where?
- Never make false promises
- Never make statements such as "I am shocked, don't tell anyone else".

d. At the end of the conversation:

- Reassure the child that they were right to tell you and show acceptance
- Let the child know what you are going to do next and that you will let them know what happens
- Contact the appropriate senior member of staff or agency
- Consider your own feelings and seek pastoral support if needed

## **8. Record keeping**

When a child has made a disclosure, the member of staff or volunteer should:

- Make brief notes as soon as possible after the conversation
- Not destroy the original notes in case they are needed by a court
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
- Draw a diagram to indicate the position of any bruising or other injury
- Record statements and observations rather than interpretations or assumptions
- Give all records to the Designated Senior Person promptly. No copies should be retained by the member of staff or volunteer

## **9. Support following a disclosure**

a. Supporting staff

Dealing with a disclosure from a child, and a child protection case in general, is likely to be a stressful experience. The member of staff or volunteer should consider seeking support for him/herself and discuss this with the Designated Senior Person who can seek support from the LSCB if required.

b. Supporting children

The school will endeavour to support all children by:

- Encouraging self-esteem and self-confidence whilst not condoning aggression or bullying
- Promoting a caring, safe and positive environment within the school
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children
- Keeping them informed of progress following a disclosure, to ensure transparency and an atmosphere in which procedures are seen to be followed correctly

## **10. Confidentiality**

All matters relating to Safeguarding are confidential.

- The Designated Senior Person will disclose any information about a pupil to other members of staff on a need to know basis only
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children
- All staff must be aware that they cannot promise a child to keep secrets

## 11. Whistle blowing

It is recognised that children cannot be expected to raise concerns in an environment where staff fail to do so. At OISC we aim to foster an environment where students and staff all feel able to raise concerns, however minor, to senior management and, ultimately, to the DSP. It is worth reminding ourselves that:

*“When faced with significant and complex concerns about a child’s welfare, it is essential that professionals ‘think the unthinkable’ and always give some consideration to child abuse as a potential cause of the presenting problems. To not do so would be a disservice to the child involved and potentially leave him/her at increasing levels of risk.”*

(Coventry LSCB – Final Overview Report of Serious Case Review re: Daniel Pelka, Sep. 2013)

The school will ensure that all staff are made aware of their duty to raise concerns about the attitude or actions of colleagues. Staff should also be well aware and comfortable with the awareness that to activate whistle-blowing policy by raising a concern will never cause them to be viewed in a negative light: just as would the legal system, OISC are infinitely happier to investigate a concern and find it to be unfounded than not to investigate a concern which later proves to be true. If necessary, staff should speak to the Designated Senior Person for further advice.

## 12. Appointment of staff

*Please see College Recruitment and Selection Procedure for more detail.*

School procedures for appointing staff are in line with the ‘Child Protection: Essential Guidance for Education staff; Safeguarding Children: Safer Recruitment and selection in Education Settings’ (DfES 2005) and OSCB procedures, as well as the guidance outlined during the Safer Recruitment Training provided by the OSCB.

These will be reviewed regularly in light of new legislation and guidance. The Principal has attended Safer Recruitment training with the OSCB, and this will be renewed *at least* every five years, in line with OSCB guidelines.

Safeguarding issues must be at the forefront in the recruitment processes for both teaching and non-teaching staff.

The appointment process is designed to deter potential offenders from applying. All applicants are required to complete application forms that are designed to prompt interviewers to spot frequent job changes and movement around the country. They state the primacy of child protection concerns at the school and require a declaration of past convictions and whether or not the candidate is on any ISA list that disqualifies them from working with children.

References are taken up in advance, and interviews include questions regarding child protection issues.

All applicants who are offered employment in posts involving access to children (whether teachers or support staff) will be subject to a Disclosure and Barring Service (DBS) Enhanced Disclosure

check before the appointment is confirmed, and this requirement is emphasised in adverts and throughout the application process. Other adults who may come into direct contact with pupils as part of their business with the school or an on infrequent basis (coach drivers, parents helping on trips) will be subject to an appropriate check which may include a DBS Disclosure. Any member of staff found not suitable to work with children will be notified to the appropriate bodies, including the ISA. In line with current guidance, any serious concern raised, whether proven or not, will be reported in staff references.

### **13. Allegations involving school staff**

- All school staff should take care not to place themselves in a vulnerable position with a child
- All staff should be aware of the school's behaviour/discipline policy
- If a pupil or parent makes a complaint of abuse against a member of staff, the person receiving the complaint must take it seriously and immediately inform the Designated Senior Person. He or she should also make a record of the concerns including details of anyone else who witnessed the incident or allegation
- The Designated Senior Person will not investigate the allegation itself, or take written or detailed statements but assess whether it is necessary to refer the matter to Social Care in accordance with the safeguarding procedures. In doing so, the Designated Senior Person will consult with relevant agencies
- If the Designated Senior Person decides that the allegation warrants further action through Safeguarding procedures he/she must make a referral direct to the local Social Care team. If the allegation constitutes a serious criminal offence, it will be necessary to contact Social Care before informing the member of staff
- Careful consideration needs to be given to the suspension of the member of staff against whom an allegation has been made. Any suspension is seen as a neutral action and does not predict the outcome of any disciplinary process. Suspension should be seen as a last resort rather than an initial go-to in case of a concern being raised.
- If it is decided that this is not necessary to refer the matter to Social Care the Designated Senior Person will consider whether there needs to be an internal investigation
- If the complaint made to a member of staff concerns the Designated Senior Person, the person receiving the complaint will immediately inform the second Designated Person who will follow the procedures above without first notifying the Designated Senior Person.

### **14. Physical intervention/positive handling**

- Oxford International Study Centre acknowledges that staff must only ever use physical intervention as a last resort and that at all times it must be the minimal force necessary to prevent injury to another person
- If the physical intervention is of a nature that causes injury or distress to a child it may be considered under child protection or disciplinary procedures
- Staff may need to take action in situations where the use of reasonable force may be required.

### **15. Bullying**

The school has a separate bullying policy. It acknowledges that to allow or condone bullying may lead to issues under safeguarding procedures.

*Please see College Bullying Policy for more information.*

## **16. Racist and derogatory comments**

Racist or derogatory comments, of any nature, will not be tolerated and repeated incidents of offensive comments, or a single serious incident may lead to consideration and disciplinary action under safeguarding procedures.

*Please see College Equal Opportunities Policy for more information.*

## **17. Inappropriate relationships**

Under no circumstances should inappropriate relationships be encouraged between adults and children. Staff should be aware that the Sexual Offences Act 2003 created a new criminal offence of abuse of trust and a new offence of meeting a child following sexual grooming.

Where a member of staff is concerned that a pupil has developed a crush on, or attachment to them, they should report this to the Designated Senior Person and should discourage social exchanges with them that are in any way different from those of the rest of their peers.

Staff should at all times have regard for their professional responsibilities and for their conduct to ensure that they uphold the letter and spirit of this policy in safeguarding children. They should be guided by the e-safety and appropriate working relationships training provided as part of the Safeguarding Programme.

## **18. Lone working**

The management acknowledge that lone working with individual children should be avoided if at all possible. However, in an institution of this type is recognised that this is a key part of our work, and therefore the following guidelines should be considered by staff:

- Let another member of staff know that they are alone with a child if the Director of Studies is not already aware of this
- Keep the door open to the room that they are in or ensure they are in a room with an uncovered glass panel in the door
- Where the lone working arrangements is a regular occurrence, for example during a booked programme of individual tuition, the child's parent/carer should be made clear of the situation
- Should anything happen during the session that makes the staff member uncomfortable, this should be reported to the Designated Senior Person immediately

## **19. Curriculum links / prevention**

- The pastoral care system, tutor system, and other activities facilitate a supportive school community
- There is a strong ethos where children feel secure and are encouraged to talk and are always listened to
- All children know there is an adult in the school whom they can approach if they are worried or in difficulty
- Curriculum opportunities are included which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help both whilst at school and in the future

## **20. Health and Safety and educational visits**

- The school places great significance on the protection of children within the school environment as reflected in the Health and Safety policy. This is extended when pupils are away from the school undertaking school trips and visits.
- The Principal, Director of Studies, and Student Services Manager seek to ensure the suitability of adults working with children on the school site at any time.
- Risk assessments must be completed for all external visits, and signed off by the Principal before they are allowed to take place

## 21. Private Fostering Arrangements

- The vast majority of students at OISC are accommodated with host families during their time in Oxford. All host families are subject to rigorous background checks, regular visits, and are expected to undergo regular safeguarding training to ensure that young people housed with them are not being placed in danger. Additionally, it should be noted that students under the age of 16 (or under the age of 18 if disabled) who are placed with a host family for 28 days or more are automatically the subject of a Private Fostering Arrangement, and there is a mandatory duty to inform the Local Authority (City Council and LSCB) of children in such arrangements.

## 22. Curfew Times

- All students 12-16 years and under must return to their host family by 9.00 pm and for those aged 16 & 17 by 10.00 pm. Under 12s are not allowed out on their own after school. For students 18 and above curfew time is discussed individually with host families on arrival. If parents wish to request a different curfew time, they must contact OISC before arrival to discuss this.

### Crucial Contacts:

Police: St Aldates	01865 - 841148
Doctor: Beaumont Street	01865 – 240501
Oxfordshire Safeguarding Children Board (OSCB):	01865 815 843
OSCB LADO (Donna Crozier):	01865 810 603
Multi-Agency Safeguarding Hub (MASH):	0845 0507666
Oxford City Assessment Team:	01865 328 563
Emergency Duty Team (out of hours):	0800 833 408
Private Fostering Worker – Kerry Chrisp	01865 323126
Hospital	01865 - 741166

NSPCC (Adult Helpline):  
NSPCC (Child Helpline):  
ChildLine:

0808 8005000  
020 78252500  
0800 1111

Independent Safeguarding Authority (ISA)

01325 - 953795 / 0300 1231111

### Useful Online Resources:

Parents Protect! –

[http://www.parentsprotect.co.uk/resources.htm?mc\\_cid=633b69242f&mc\\_eid=00b7a1a7cf](http://www.parentsprotect.co.uk/resources.htm?mc_cid=633b69242f&mc_eid=00b7a1a7cf)

OSCB online – <http://www.oscb.org.uk/>

Safeguarding In Schools: Andrew Hall - <http://www.safeguardingschools.co.uk/>

NSPCC: Fighting For Childhood - <https://www.nspcc.org.uk/fighting-for-childhood/>

### **REVIEW AND VERIFICATION**

This policy is reviewed at least annually.

<b>Date</b>	<b>Version</b>	<b>Name of reviewer</b>	<b>Date of next review</b>
<b>January 2012</b>	2012	Hannah Talbott	Early 2013
February 2013	2013	Carolyn Llewelyn	Early 2014
February 2014	2014	Dawn Tohill	Early 2015
February 2015	2015	Ben Llewelyn	Early 2016
November 2015	2015 v2	Ben Llewelyn	Early 2016
March 2016	2016	Ben Llewelyn	Late 2016
June 2016	2016 v2	Ben Llewelyn	Late 2016
January 2017	2017	Ben Llewelyn	Late 2017
November 2017	2017 v2	Ben Llewelyn	Late 2018
December 2018	2018 v1	Ben Llewelyn	December 2019
April 2019	2018 v2	Ben Llewelyn	December 2019
March 2020	2018 v3	Ben Llewelyn	December 2020

September 2020	2018 v4	Ben Llewelyn	June 2021
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