



Oxford International Study Centre
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Specialist Safeguarding Policy: Significant Current Concerns

Section A: Female Genital Mutilation (FGM)

Introduction

OISC has a robust and thorough Safeguarding Policy and ensures that tutors, management staff and host families are appropriately trained in line with this policy. In line with the updated Children Act (2015), this specialist policy has been implemented to deal with sensitive issues not necessarily covered in appropriate depth by the general Safeguarding Policy. This policy has therefore been produced in line with the Policy and Expectation on the Care of International Students under the Age of 18 document issued by the Oxfordshire Safeguarding Children Board (OSCB) in June 2015.

“Parties shall take all effective and appropriate measures with a view to abolishing traditional practices prejudicial to the health of children.” (Children’s Rights and Responsibilities, UNICEF)

It is now acknowledged and accepted that Female Genital Mutilation (hereafter FGM) constitutes child abuse and should be treated as such and accordingly dealt with under the Child Protection and General Safeguarding Policy of the college. Staff are reminded that safeguarding is a responsibility of all those who interact with students, and all staff are expected to adhere to and follow these policies closely. In dealing with issues surrounding FGM, OISC uses the World Health Organisation, as given below:

“Female Genital Mutilation (FGM) comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons.”
(World Health Organisation, 1997)

All forms of FGM are to be treated as constituting abuse. These may include: clitoridectomy, excision, infibulation, or other genitally-damaging practices.

Information from several documents has been taken in producing this policy. These include: *The South West Child Protection Procedures Guidelines for FGM*, the Home Office guidelines, and the *Ofsted* guidelines for Inspecting Safeguarding, and well as the FGM Policy of St Werburgh’s Primary School, Bristol, which is considered to be a strong and robust policy and is held as an example of good practice here.

The Home Office has produced guidance on FGM that states unequivocally:

“FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practiced on a child it is a violation of the child’s right to

life, their right to their bodily integrity, as well as their right to health. The UK Government has signed a number of international human rights laws against FGM, including the Convention on the Rights of the Child.”

It should be noted especially that this guidance allows for **no possible scenario** where FGM is to be considered ethical or acceptable, under any cultural or religious circumstance. Staff are reminded that even if instances where a child considers FGM to be normal or common practice within their culture or even family situation, the practice is still to be considered as abuse and is to be dealt with as such.

The Home Office guidance continues:

“Girls are at particular risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they may be at risk of undergoing FGM. UK Communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However, women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women.”

It is important to note, however, that the above list cannot be considered exhaustive and staff are encouraged to be vigilant in their awareness of FGM and its potential victims even amongst students who are not part of one of the high-risk groups listed above.

Parents are reminded of the advice given in the college’s main Safeguarding Policy, namely:

Department for Education guidance in ‘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.”

As of January 2013, Ofsted have included FGM in their ‘Inspecting Safeguarding’ briefing for inspectors. Though OISC is not an Ofsted-inspected school, it is considered that the relevant details of this briefing still apply to OISC and its students, and therefore our policy has been created in line with these. With serious issues concerning child abuse, we consider it pertinent to operate to the strictest guidelines available in order to ensure college safeguarding procedures are as robust as possible. Below are excerpts from the document mentioned above, taken from Annex 4: Female Genital Mutilation:

“Designated senior staff for child protection in schools should be aware of the guidance that is available in respect of FGM, and should be vigilant to the risk of it being practised. Inspectors should be also alert to this when considering a school’s safeguarding arrangements, and where appropriate ask questions of designated staff. Key questions could include:

- *Are designated senior staff for child protection aware of the issue, and have they ensured that staff in the school are aware of the potential risks?*
- *How alert are staff to the possible signs that a child has been subject to female genital mutilation or is at risk of being abused through it?*
- *Has the school taken timely and appropriate action in respect of concerns about particular children?”*

In light of these questions, OISC takes the following action in order to ensure vigilance against the dangers of FGM, and to prevent female students being forced to undergo any FGM procedures:

- A robust and firm attendance policy that does not authorise holidays outside the standard dates, and does not authorise extension of planned holidays.
- FGM training for senior management and Child Protection leads.
- Discussion of issues surrounding FGM by the Principal with parents of children from communities known or believed to practice FGM, who may therefore be at risk, before commencement of studies.
- Ensuring all tutors are aware of the FGM policy and the below indicators, and have an idea of the relevant questions to ask, or signs to look out for, when teaching students considered to be potentially at risk.

Indications that a student may be at risk of FGM

- The student comes from a family or community that is known to practice FGM – especially if there are elderly women present.
- A student mentions FGM or issues surrounding the practice in conversation, or seems noticeably more aware of the practice that would be expected for their age group.
- A student may express some anxiety or make mention of a special ceremony.
- A student may demonstrate anxiety or unhappiness about upcoming trips to their country of origin, or meetings or interaction with their parents or members of their domestic community.
- The parents or guardian of the student requests permission for additional authorised absence for overseas travel, or you are made aware that absence is necessary for vaccinations, or other medical treatment.
- You are made aware that a woman linked closely to the student has already undergone FGM. In this instance urgent consideration needs to be given to the safeguarding and child protection implications for, eg., younger siblings, extended family members who fall under the college's care, and a referral ought to be made to the OSCB or police if appropriate.

Indications that FGM may have taken place

- Prolonged absence from the college with noticeable behaviour change on return – especially after a return from a trip overseas.
- Long periods regularly spent away from class during the day or an unusually high number of toilet trips taken – especially if other indications are displayed.
- Student seems in prolonged and acute pain, especially when first sitting down, standing up, or whilst walking.

If you suspect that a student has been a victim of FGM, you may ask them:

- We are aware that your family is originally from a country where girls or women sometimes undergo certain surgical procedures – do you think you may have gone through something like this?
- Has anything been done to you in any very sensitive or private areas?
- Would you like to talk to someone who may understand you better?
- Would you like any help or support in understanding what has happened to you, or to give you any advice on what to do next?

- Would you like any medical treatment?

The questions provided are intended as guidance only and should be used at the discretion of staff. Each case is to be considered independently and should be dealt with sensitively, with due awareness given to the personal and intimate nature of FGM practices and the fact that, as a result, students may be withdrawn or unwilling to immediately engage with discussion of these issues. Using this guidance and referral thereafter is at the discretion of the Principal and no such action should take place without first discussing this with him.

All interventions should be accurately and sensitively recorded, with reassurance of confidentiality given to students at all times.

If we have concerns that students at OISC are at risk or have been victims of FGM, we will make immediate contact with the OSCB and the police if necessary. It should be noted by all staff that as well as constituting a serious breach of child protection policy, the practicing of FGM has been a criminal offence since 1985 (Prohibition of Female Circumcision Act). In 2003, the Female Genital Mutilation Act repealed and re-enacted the provisions of the 1985 act and revised it to set the maximum penalty for FGM to 14 years' imprisonment, and also made it a criminal offence for UK national or permanent UK residents either to perform FGM overseas, or to take a UK national or permanent UK resident overseas in order to undergo FGM. Staff should therefore be well aware that even in cases where FGM practices have taken place outside the UK, these practices are still in breach of the law and will be treated and punished as such. Staff should be reminded that there is a mandatory duty on teachers to report disclosures on FGM about a female under 18.

For further information on FGM and vigilance against it, staff are encouraged to view the Female Genital Mutilation Act 2003, and to consult the NSPCC website, specifically the section on Female Genital Mutilation, under the heading 'Child Abuse and Neglect'.

Female Genital Mutilation constitutes a form of abuse categorised under cultural beliefs, practices and traditions. Other significant examples of this include Forced Marriage, and Belief in Spirit Possession. Should staff suspect either of these practices are taking place, or that students are at an increased risk of these practices, they should seek advice from the Principal.

Section B: Child Sexual Exploitation (CSE)

Introduction

Whilst sexual abuse is addressed in the general Safeguarding Policy of the college, it is noted that, especially in light of recent high-profile instances of Child Sexual Exploitation (hereafter CSE) in Oxford and surrounding areas, it is important that the school policy on CSE specifically is made explicit. This additional policy has therefore been produced in line with the Policy and Expectation on the Care of International Students under the Age of 18 document issued by the Oxfordshire Safeguarding Children Board (OSCB) in June 2015, and is largely made up of excerpts from NSPCC and CrimeStoppers guidance on CSE. In handling issues surrounding CSE, OISC uses the definition provided below:

*"The sexual exploitations of children and young people **under 18** involves situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of performing, and/or others performing on them, sexual activities. Child sexual exploitation can occur through use of technology without the child's immediate recognition, for example the persuasion to post*

sexual images on the internet/mobile phones with no immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources.”

(The National Working Group for Sexually Exploited Children & Young People, 2008)

CSE is not restricted by gender: both girls and boys can be exploited.

Staff should be aware that CSE is a crime that can affect any child, any time, anywhere, regardless of their social or ethnic background. Any suspicion that CSE has taken place, or that a student might be at risk of CSE, should be reported immediately to senior management. Staff should not attempt to discuss or handle the situation independently.

Indications that a student might be at heightened risk of CSE

It is important to note that **ALL** children and young people, including those from supportive families, can be vulnerable to CSE. However, some children are known to be at greater risk, including (but not limited to) those who:

- Have a chaotic or disordered home / family life.
- Have a history of abuse (including familial child sexual abuse, risk of forced or ‘arranged’ marriage, risk of ‘honour’-based violence, physical and emotional abuse and neglect.
- Have experienced recent loss / bereavement.
- Are associated with gangs through relatives or peers, or are living in a known gang neighbourhood.
- Have friendships with children/other young people who are being or have been sexually exploited.
- Have learning difficulties.
- Live in residential care, or hostel/bed & breakfast accommodation rather than with family members, or in a college-organised host family.
- Have noticeably low self-esteem or self-confidence.
- Are Young Carers (ie. Have caring responsibilities for parents/family members with mental or physical health problems, or who are misusing substances)

It is noted that many of the indicators listed above will be less immediately relevant or identifiable given the nature of the student body at OISC – students will not typically be living in their own family settings and will not be native to Oxford and the school surroundings. It is therefore important that staff are even more vigilant to those signs which are more likely to manifest themselves in our students – namely personality changes and withdrawal, or bad behaviour, as well as the others given below.

Indications that a student may be being sexually exploited

The reaction of young people to CSE will vary greatly in each case, however listed below are some common indicators that CSE may be taking place. Children who are being sexually exploited may be:

- Going missing from their host family or accommodation.
- Regularly absent from school without authorisation or good explanation.
- Increasing their use of social media, dating sites or image-sharing apps.
- Involving in risky-sounding online relationships, including new contacts with people who do not live in Oxford.
- Sharing inappropriate/indecent online images or messages with peers and other students, or with strangers online.

- Becoming increasingly isolated/estranged from friends and tutors/host families.
- Meeting people whom they have befriended online.
- Involved in offending behaviour of any kind.
- Misusing drugs or alcohol.
- Experiencing sexual cyber-bullying.
- Changing their physical appearance in a noticeable way.
- Experiencing sexually-transmitted infections or pregnancy; especially when this is inappropriate for their age group.
- In poor mental health, and/or self-harming, having thoughts of suicide, or experiencing an eating disorder.
- Beginning to receive money and/or gifts from unknown sources or suddenly having possessions which seem to be out of their usual financial reach.

In assessing whether a student might be a victim of CSE, or at risk of becoming a victim, careful consideration should be given to issues surrounding consent. It should especially be noted that:

- A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching.
- Sexuality activity with a child under 16 is an offence.
- It is an offence for a person to have a sexual relationship with a 16 or 17 year old if they hold a position of trust or authority in relation to them.
- Where sexual activity with a 16 or 17 year old does not result in an offence being committed, it may still result in harm, or the likelihood of harm being suffered.
- Non-consensual sex is rape whatever the age of the victim.
- If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed.

Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18 years and not just those in a specific age group.

If you suspect that CSE may be taking place, or that a student may be at risk of CSE:

Any member of staff who suspects, or receives information that a student **may** be involved in sexual exploitation (including suspicion that they are being groomed online) should refer their concerns immediately to the Principal, who will then refer the issue to the relevant authorities. Staff should **not** attempt to stage their own intervention or to handle the issue independently, as this may inadvertently put the young person at further risk of harm.

The Principal will then consult the Local Authority Designated Officer at the OSCB and joint action will be taken from that point.

It is important to note that, where appropriate, the student's wishes and feelings, as well as those of their mothers, fathers, and carers, should be sought and taken into consideration when decided how to proceed. However, practitioners should be aware that this may not always be in the child or young person's best interest and may put them at further risk of harm.

Section C: Radicalisation and the PREVENT Agenda

Introduction

Radicalisation and the prevention of terror attacks is, quite rightly, at the forefront of current Government thought and activity. The HM Government 2011 document on PREVENT strategy states:

“Intelligence indicates that a terrorist attack in our country is ‘highly likely’. Experience tells us that the threat comes not just from foreign nationals but also from terrorists born and bred in Britain. It is therefore vital that our counter-terrorism strategy contains a plans to prevent radicalisation and stop would-be terrorists from committing mass murder.”

(HM Government: ‘PREVENT Strategy, 2011)

It is nationally important, and essential to any policy designed to counter terrorist behaviour that we recognise that, just as with all matters relating to safeguarding, there can be no single fixed category of people from which terrorists or radicalised individuals derive. It is a commonly-held misconception that all terrorist or radical behaviour relates to extreme forms of Islam and to the promotion of jihad: however, this policy aims to tackle extremist behaviour of *all* types, and to prevent students becoming radicalised by any extremist groups, including neo-nazi or fascist British organisations and radical organisations of non-religious, but equally extreme, beliefs.

As part of OISC’s continuing commitment to safeguarding and to promoting the welfare of its students, it is important that this policy recognises that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. It is important that work to combat radicalisation is done carefully and with mutual respect, especially in light of the often culturally and racially sensitive nature of the PREVENT strategy. All staff are expected, in their work to prevent extremist behaviour and the radicalisation of students, to uphold and promote the law, personal liberty and values, including religious beliefs, and tolerance of those with different faiths and beliefs. HM Government’s PREVENT Strategy (2011) makes it quite clear that “The ideology of extremism and terrorism is the problem; legitimate religious belief emphatically is not.”

Given the culturally, internationally, and religiously diverse nature of the student body at OISC, it is important that PREVENT strategy is at the forefront of safeguarding work, and that all staff are especially vigilant towards signs of potential radicalisation of our students.

Definitions

Radicalisation is defined as the act or process of making a person more radical, or favouring of extreme or fundamental changes in political, economic or social conditions, institutions, or habits of the mind.

Extremism is broadly defined as the holding of extreme political or religious views. The Government PREVENT Strategy adds to this definition: “vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death or members of our armed forces, whether in this country or overseas.” (PREVENT Strategy, 2011)

OISC operates a zero tolerance approach to extremist behaviour for all members of the college community.

The main aim of this policy is to ensure that staff are fully engaged in being vigilant about radicalisation; that they continue to operate with the belief that 'it could happen here' and that *anyone* can be capable of abusive or dangerous behaviour or all types – including radical or extremist behaviour; and that OISC continues to work alongside other professional bodies, with a multi-agency approach, to ensure that all students can work in an environment free from harm.

Extremists of all systems of belief aim to develop destructive and negative relationships between different communities and social or religious groups, by promoting division, fear and mistrust of others, usually based on ignorance or prejudice, and, as a result, leading to a limited and narrow-minded world view, and stunted opportunities for young people. OISC fosters a vibrant, multi-cultural atmosphere, and aims to resist this destruction and division by equipping its students, through education, exchanging of cultural ideas and personal beliefs, and encouraging rational debate, with the knowledge, skills and critical thinking to form their own views, uninhibited by those who may seek to radicalise them.

It is recognised that one of the first signs of extremist views is often the use of derogatory language, or the expression of prejudice against specific groups: staff are therefore reminded of the college Equal Opportunities Policy and their duty to take a zero-tolerance approach towards language of a discriminatory nature. Staff should report any disturbing and/or extremist language used by students to senior management immediately, especially if they believe it might speak of a wider pattern of extremist behaviour.

Staff should be especially vigilant towards the following, which might suggest a student is particularly vulnerable to terrorist ideology:

- Use of graffiti symbols, writing or artwork promoting extremist messages or images
- Pupils accessing extremist material online, including through social media
- Distribution of extremist documents or publications
- Parents or agents reporting changes in behaviour, peculiar new friendships or requests for help
- New friendships or social circles which seem unusual or age-inappropriate, or related directly to a specific religious belief, which does not seem in-keeping with a student's personality or personal conduct
- Pupils voicing opinions drawn from extremist ideologies
- Use of extremist or cultural/religious terms to exclude others or to incite violence
- Intolerance of difference, or behaviour which actively goes against the college Equal Opportunities Policy, especially if this is in a consistent and targeted manner against a particular minority group
- Attempts to impose extremist views or practices on others
- Anti-British views or beliefs

Just as in the application of all safeguarding protocol, it is important to recognise that certain groups of young people will be more vulnerable to radicalisation, including those from unstable family settings, those with mental health issues or LDD, or, particularly in the case of students at OISC, those who are non-native English speakers, especially those who have particularly low levels of English. OISC will be guided by LSCB guidelines and by further HM Government legislation in our continued application of the PREVENT Strategy.

If you suspect that a student might have already been radicalised, or might be at significant risk of radicalisation:

Staff should refer their concerns immediately to the Principal, who will then refer the issue to the relevant authorities. Staff should **not** attempt to stage their own intervention or to handle the issue independently, as this may inadvertently put the young person at further risk of harm.

The Principal will then consult the Local Authority Designated Officer at the OSCB and joint action will be taken from that point, with reference to national policy and in discussion with lead personnel on the PREVENT agenda if necessary. Just as with whistle-blowing procedure relating to any concern, staff should take the approach that raising a concern which later proves unfounded is greatly preferable to failing to active whistle-blowing procedure for a concern which later proves to have been significant, and OISC will support staff fully in disclosures of any kind.