

Online Safety Policy

In all its dealings with international students and their families and UK schools, Oxford Guardians (OG) will follow the general standards laid out by The Association for the Education and Guardianship of International Students (AEGIS) in their Code of Practice, which are as follows:

- To promote and provide best and legal practice in the guardianship and hosting of all international students at schools, colleges and universities, particularly those under 18 years of age.
- To respect and support the rights, religions and customs of the international student.
- To uphold the stated ethos and values of the school attended by students in our guardianship.
- To comply with the Children Acts 1989 and 2004 and the Education Act (2002) and adhere to the guidance of the Keeping Children Safe in Education 2024 (KCSIE) updated September 2024.
- To ensure all international students have 24 hour emergency contact with a responsible adult in the UK.
- To put in place arrangements which maintain appropriate contact with the international student, the overseas parents and guardianship family and to ensure all appropriate records are up to date.
- To provide both pastoral and educational support as outlined in any literature and agreements.
- To adhere to the AEGIS grievance procedures.
- To have appropriate insurance for guardianship arrangements and to comply with UK legislation.

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Glossary of terms used in this Policy

Term	Definition
Child	A student under the age of 18
Young Person	A student over the age of 18
Parent/carer	The student's parents or carers who reside overseas
Homestay Host	The primary carer in a Homestay placement
Primary Carer	The responsible adult who takes responsibility for the student whilst they are staying in their Homestay placement
Homestay Family	The family unit comprising all members of the family who normally live in the Homestay placement
Local Guardian	The Oxford Guardians' lead person for a geographical area in which there are students attending school

Acronyms used in this Policy

Acronym	Definition
BSA	Boarding Schools Association
DBS	Disclosure and Barring Service
DfE	Department for Education
DSL	Designated Safeguarding Lead
ICT	Information and Communication Technology
KCSIE	Keeping Children Safe in Education
FBV	Fundamental British Values
LADO	Local Authority Designated Officer
LSCB	Local Safeguarding Children Board
LSP	Local Safeguarding Partners
OG	Oxford Guardians

This policy reflects the current statutory guidance 'and is in keeping with Ofsted guidance

Oxford Guardians' Online Safety Policy is linked to our Safeguarding and Child Protection Policy and should be read in conjunction with that document.

The Directors of Oxford Guardians, in consultation with the Designated Safeguarding Leads, are responsible for ensuring all policies and practices relating to online activities are kept up to date.

To ensure that this policy is effective on a day-to-day basis, Oxford Guardians will review at least annually the systems that are in place in relation to safeguarding the children and young people in our care and evaluate their effectiveness.

Oxford Guardians' Online Safety Policy

This policy has been developed in accordance with the principles established by the Children Acts (1989 and 2004) and the Education Act (2002) and is in line with government publications) <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2> and <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>,

https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf

Oxford Guardians recognises the benefits and opportunities conferred by new technologies and we encourage their use in order to enhance skills, to provide a means of keeping in contact with friends and family, to entertain and to promote academic achievement. However, the accessible and global nature of the internet and the variety of technologies available mean that we need also to be aware of the potential risks and challenges associated with children and young people's use of ICTs.

Oxford Guardians takes very seriously its responsibilities under section 175 of the Education Act 2002 to safeguard and promote the welfare of children and to work together with other agencies to ensure adequate arrangements are in place to identify, assess and support those children and young people who are suffering harm.

We recognise that children and young people can be more at risk when using technology in their Homestay placements than in school and that Oxford Guardians' Homestay Hosts have a key role to play in ensuring the online safety of the children and young people in their care. Further, we recognise that all adults, including Homestay Guardians, have a full and active part to play in promoting the social, physical and moral development of each child in our care and also in protecting children and young people from harm. The child's welfare is our paramount concern.

We are committed to providing a caring, positive, safe and stimulating environment that complements the educational provision the children in our care access whilst they are at school in the UK. Our ethos reflects the articles laid out in the [United Nations Convention on the Rights of the Child](#) (UNCRC) which underpin all aspects of the support we offer to the children in our care.

Section 1.0: Policy Aims

1.1 To support each child/young person's development in ways that will foster security, confidence and independence.

1.2 To provide an environment in which children and young people feel safe, secure, valued and respected and know whom to approach if they are in difficulties.

1.3 To establish an ethos whereby children and young people are listened to and their concerns addressed.

- 1.4 To raise the awareness of all Oxford Guardians staff, including Homestay Hosts, of their statutory duty to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- 1.5 To provide a systematic means of monitoring children/young people known or thought to be at risk of harm and to ensure Oxford Guardians' staff contribute to assessments of need and support packages for those children/young people.
- 1.6 To emphasise the need for good levels of communication between all members of Oxford Guardians' staff.
- 1.7 To develop a structured, documented procedure within the organisation which will be followed by all members of the Oxford Guardians team in cases of suspected online abuse.
- 1.8 To develop and promote effective working relationships with other agencies, especially staff at the schools attended by the children and young people in our care, the Police and Social Care.
- 1.9 To ensure that all staff working within Oxford Guardians who have access to children have been checked as to their suitability for the role, including verification of their identity, qualifications and a satisfactory DBS check and to ensure a central record is kept of these checks for audit purposes.
- 1.10 To promote the safe use of ICTs and the internet and to ensure that all Oxford Guardians staff, parents and children and young people understand the risks associated with such activities.
- 1.11 To clearly establish and maintain appropriate boundaries in relation to the use of ICTs and the internet by the children and young people in our care.

Section 2.0: Keeping Children and Young People Safe Online: Roles and Responsibilities

2.1 Homestay Hosts

- 2.1.1 Oxford Guardians' Homestay Hosts must be aware that whilst a child/young person is staying in their home, they are responsible for ensuring that the child/young person is kept safe online.
- 2.1.2 Oxford Guardians' Homestay Hosts are responsible for reporting any suspected misuse or concern about a child/young person's online activities to an Oxford Guardians' DSL except in cases where an illegal act has taken place or is suspected to have taken place and the child/young person is at immediate risk of harm when they should first report it to the police and then to an Oxford Guardians' DSL.
- 2.1.3 Oxford Guardians' Homestay Hosts should know what devices in their homes connect to the internet and how.

2.1.4 Oxford Guardians' Homestay Hosts should make sure they are aware which devices the child/young person in their care uses to connect to the internet e.g. their phone, the TV or a games console.

2.1.5 Oxford Guardians' Homestay Hosts should find out how the child/young person in their care is accessing the internet. It may be through the Homestay Host's connection or through a neighbour's Wi-Fi; this will affect whether or not any safety settings are being applied.

2.1.6 Oxford Guardians' Homestay Hosts should use parental controls on devices that link to the internet such as the TV, laptops, computers, games consoles and mobile phones. Parental controls are a tool that can be used to set, maintain and adjust appropriate boundaries as the child/young person grows and develops.

2.1.7 Oxford Guardians' Homestay Hosts should ensure that equipment belonging to them that connects to the internet is kept in a family space i.e. downstairs in the living rooms rather than upstairs in a bedroom. This can help ensure that internet use is monitored. Homestay hosts should monitor use of phones etc. overnight to make sure the child/young person is not spending excess time playing online games or using the internet for other purposes.

2.1.8 Acting in loco parentis, Oxford Guardians' Homestay Hosts should be involved in the child's/young person's online life by talking to them about what they're doing online. In this way, the child/young person is more likely to approach their Guardian if they need support.

2.1.9 Oxford Guardians' Homestay Hosts will build awareness amongst the children and young people in their care about ensuring that the child/young person:

- only has friends online that they know in real life;
- is aware that if they communicate with somebody that they have met online, that relationship should stay online

In addition, Oxford Guardians' Homestay Hosts should:

- recognise the signs of grooming and other problematic online behaviours;
- have regular conversations with the children/young people in their care about their online activities and how to stay safe online.

2.1.10 Oxford Guardians' Homestay Hosts should ensure they have read, understood and signed the OG Acceptable Use Agreement for staff (see Appendix 4).

2.1.11 Where there are concerns relating to a child/young person's online activities, Oxford Guardians' Homestay Hosts will liaise with the Oxford Guardians' DSL for advice.

2.2 Oxford Guardians' Designated Safeguarding Leads (DSLs)

2.2.1 Oxford Guardians' DSLs are the first point of contact for Homestay Hosts where there are concerns about a child/young person's online activities except where an illegal act has taken place or is suspected of having taken place and the child/young person is at immediate risk of harm in which case the police should be contacted first and then the Oxford Guardians' DSL informed.

2.2.2 Oxford Guardians' DSLs are responsible for keeping written records of any safeguarding concerns relating to a child/young person's online activities and for ensuring that appropriate follow-up actions are taken in order to address those concerns.

2.2.3 Oxford Guardians' DSLs should ensure they keep up to date with their online safeguarding awareness training as specified in the Oxford Guardians' Safeguarding and Child Protection Policy.

2.2.4 Oxford Guardians' DSLs take day-to-day responsibility for e-safety issues and have a leading role in reviewing the school e-safety policies and documentation, including the incident log.

2.2.5 Oxford Guardians' DSLs should provide training to ensure that all staff are aware of the procedures that need to be followed in the event of an e-safety incident.

2.2.6 Oxford Guardians' DSLs should provide and keep a record of all safeguarding training undertaken by Oxford Guardians' staff.

2.2.7 Oxford Guardians' DSLs and senior managers meet on weekly basis with Oxford Guardians' Director to discuss current cases and to review incident logs.

2.3 Oxford Guardians' Directors

2.3.1 Oxford Guardians' Directors have overall responsibility for ensuring that policies relating to safeguarding and child protection, including online safety, are reviewed at least annually and are made available to all stakeholders.

2.3.2 Oxford Guardians' Directors are responsible for ensuring the safety (including e-safety) of all children and young people in the care of Oxford Guardians, though the day-to-day responsibility for e-safety is delegated to the Oxford Guardians' DSLs and to Homestay Hosts.

2.3.3 Oxford Guardians' Directors must ensure that written permission is obtained from all staff and parents for the use of photographs of individuals (students, parents, staff etc.) on its website and in all publicity, material pertaining to the Guardianship Organisation. The names of the individuals in any photographs that are used in this way should not be used in publicity materials or on the website in order to prevent third parties from being able to identify those individuals by name.

2.3.4 Oxford Guardians' Directors are responsible for ensuring that they hold regular meetings with the DSLs with an agenda to include:

- monitoring of e-safety incident logs
- monitoring of safeguarding training received by all members of Oxford Guardians' staff

2.3.5 Oxford Guardians' Directors should be aware of the procedures to be followed in the event of a serious e-safety allegation being made against a member of Oxford Guardian's staff.

Section 3.0: Monitoring, Evaluation and Review

Oxford Guardians' Online Safety Policy will be monitored and evaluated by:

- Scrutiny of a range of risk assessments
- Reviews of induction procedures for new staff
- Reviews of concerns expressed by children/young people relating to their online safety
- Reviews of concerns expressed by Homestay Hosts
- Reviews of concerns expressed by parents
- Reviews of any documented cases where Oxford Guardians' staff have been involved.

The policy will also be reconsidered where concerns are raised by members of the Oxford Guardians team, by students, by families or where an e-safety incident has been recorded.

POLICY REVIEWS

Review Date	Reviewed By	Appointment
1 Dec 2020	KT Bacon	DSL
4 Dec 2021	KT Bacon	DSL
7 Dec 2022	KT Bacon	DSL
10 Dec 2023	KT Bacon	DSL
15 Dec 2024	KT Bacon	DSL

Date Reviewed	Reviewed By	Appointment
27 November 2020	Lexi Dyer	DDSL
20 November 2021	Lexi Dyer	DDSL
20 November 2022	Lexi Dyer	DDSL
5 December 2023	Lexi Dyer	DDSL
15 December 2024	Lexi Dyer	DDSL