

Safeguarding and Child Protection 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
CSE	Child Sexual Exploitation
DfE	Department for Education
DSL	Designated Safeguarding Lead
KCSIE	Keeping Children Safe in Education
FBV	Fundamental British Values
FGM	Female Genital Mutilation
HBV	Honour Based Violence
FM	Forced Marriage

LADO	Local Authority Designated Officer
LSP	Local Safeguarding Partnership formerly Local Safeguarding Children Board (LSCB)
MASH	Multi Agency Safeguarding Hub
PSHE	Personal, Social and Health Education
SRE	Sex and Relationships Education

Key Definitions: ‘Safeguarding’ and ‘Child Protection’

Safeguarding is what we do for all children/young people and is everyone’s responsibility. It involves protecting children from abuse, neglect, exploitation and any maltreatment, preventing impairment of children’s health, and development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and providing help and support to meet the needs of children as soon as problems emerge as well as taking action to enable all children to have the best outcomes regardless of age, ability, race, culture, religion, sexuality or class. Safeguarding extends to protecting children from maltreatment online.

Child Protection is what we do for children who have been harmed or who are at significant risk of being harmed. All staff should be aware of the indicators of abuse, neglect and exploitation. It involves identifying and managing the support needs of specific children/young people who have suffered or who are at risk of significant harm due to one or more of the following types of abuse:

- **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. Harm can occur when a child witnesses the ill treatment of others.

- **Physical Abuse:** deliberately hurting a child/young person causing injuries such as bruises, broken bones, burns or cuts. Children/young people who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

- **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.

- **Neglect:** Neglect is the ongoing failure to meet a child/young person's basic needs. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents/carers.

- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>.

- **Child Criminal Exploitation:** Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening or committing serious violence to others.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are treated as perpetrators despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

- **Child sexual exploitation (CSE)**

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact

activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media.

CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17-year-olds who can legally consent to have sex. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship.

• **Exposure to Extremism:** Under section 26 of the Counterterrorism and Security Act (2015 updated 10 April 2019) all Oxford Guardians' staff have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent Duty. Oxford Guardians contributes to building children and young people's resilience to radicalisation by promoting fundamental British values and by enabling children and young people to challenge extremist views.

• **Child On Child Abuse:** children can abuse other children. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying).
- Abuse in intimate relationships sometimes known as 'teenage relationship abuse.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence, such as rape, assault by penetration and sexual assault.
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- upskirting, which 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.
- sexting (also known as youth produced sexual imagery).
- and initiation/hazing type violence and rituals.

• **Other:** domestic violence, bullying (including cyberbullying), drugs, induced illness, youth violence, faith abuse, sexting, teenage relationship abuse. For further information, visit NSPCC website (details in Appendix 8).

• **Gender Questioning** - The 'Children who are lesbian, gay, bisexual, or gender questioning' section is currently under review pending the outcome of the gender questioning children guidance consultation (DfE, 2023b) and final gender questioning guidance documents being published.

Schools have been advised that they should take a cautious approach and consider the individual needs in consultation with the child's parents, except in the very rare cases doing so would constitute a significant risk of harm to the child. Clinical advice is to be sought and consideration to wider issues such as the risk of bullying. OG as educational guardians will liaise as necessary with the school for the child and parents and in a neutral capacity.

• In accordance with the above definitions, Oxford Guardians' Safeguarding Policy will be fairly broad in terms of content whilst our Child Protection Policy will refer to clear procedures. Oxford Guardians' Safeguarding Policy includes our Child Protection Policy as well as links to other policies and covers:

- Welfare, Health and Safety including Missing Child and Drug/Substance Misuse
- Data Protection and Confidentiality
- Online Safety including use of IT and the internet
- Safer Recruitment including Disclosure and Barring Service checks and record-keeping
- Professional Code of Conduct
- Behaviour and behaviour management
- Whistleblowing
- Complaints

With regard to safeguarding and child protection, the relevant statutory requirements are for policies and procedures to be in place to cover:

- Health and Safety
- Central record of recruitment and vetting checks
- Child protection policy and procedures
- Statement of procedures for dealing with allegations of abuse against staff

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:

- a) safeguarding the children and young people in our care and
- b) ensuring recruitment practices and procedures are followed rigorously and that Oxford Guardians' staff are properly vetted and trained.

Oxford Guardians' Safeguarding Policy

This policy has been developed in accordance with the principles established by the various Children Acts (1989 and 2004) and the Education Act (2002) and is in line with current government publications

https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf

This policy reflects the current statutory guidance at:

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

Oxford Guardians takes very seriously its responsibilities under section 175 of the [Education Act 2002](#) and section 7 of the [Education \(Independent Schools Standards\) \(England\) Regulations 2010](#) amended 2014 (Handling Complaints) 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, regardless of age, ability, race, culture, religion, sexuality or class.

We recognise that all adults, including Homestay Hosts, 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, and we will not tolerate any form of bullying or abuse that affects the children and young people in our care.

We are committed to providing caring, positive, safe and stimulating environments that complement the educational provision the children and young people in our care 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 and young people in our care.

Underpinning our work to safeguard the children and young people in our care is our commitment to following Safer Recruitment procedures, including obtaining enhanced DBS checks with list 99 (Children's barring list) on all Oxford Guardians' staff who may come into contact with children and young people and ensuring pre-appointment checks are carried out in line with the statutory guidance set out in

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

We will comply with all aspects of the Data Protection Act 2018 and the GDPR UK in our collection, processing and storage of data as detailed in our DPA and GDPR Policy the detail of which is contained our separate DPA and GDPR policy document. All staff and associates are aware that safeguarding is processing condition that allows the passage of information without consent if where there is good reason to do so and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that staff would gain consent and if to gain consent would place the child at risk.

In short, the Data Protection Act 2018 and UKGDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. Further details can be found at

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Section 1.0: Policy Aims

1.1 To support each child and 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 duty to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse (Reference Appendices 1 through 6).

1.5 To provide a systematic means of monitoring children 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 and young people.

1.6 To emphasise the need for good levels of communication between all members of Oxford Guardians' staff and school staff.

1.7 To develop a structured, documented procedure within Oxford Guardians which will be followed by all members of the Oxford Guardians team in cases of suspected abuse.

1.8 To develop and promote effective working relationships with other agencies, especially the Police and Social Care.

1.9 To ensure that all Oxford Guardians' staff 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 ensure that there are two senior leaders within Oxford Guardians who are named as Designated Safeguarding Leads (DSLs) and Deputy DSL and that they receive initial and refresher training in relation to their role in Safeguarding and Child Protection.

1.11 To ensure that all other Oxford Guardians' staff receive initial and refresher training on Safeguarding and Child Protection and that a record of training is maintained centrally.

Section 2.0: Safe Environments, Safe Staff

2.1 All members of Oxford Guardians' senior management team understand and fulfil their responsibilities in relation to safeguarding and child protection, namely, to ensure that:

- There is a Child Protection policy together with a staff behaviour (code of conduct) policy and that these documents are made available to parents, carers, Homestay Hosts and other Oxford Guardians' staff.
- Oxford Guardians operates safer recruitment procedures ensure that there is at least one person in the core staff that has completed Safer Recruitment training.
- Oxford Guardians has procedures in place for dealing with allegations of abuse against its own staff and against staff in the schools attended by the children in the care of Oxford Guardians.
- A referral to the DBS is made if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. 1.
- A senior leader has Designated Safeguarding Lead (DSL) responsibility and there is a deputy Designated Safeguarding Lead, also someone on the senior leadership team.
- On appointment, the DSLs undertake appropriate training and complete a refresher course every 2 years and that a record of this training is maintained.

1 Failure to notify DBS service in appropriate circumstances is a criminal offence.

- The DSL and DDSL are to complete the HMG e learning Prevent training and retain the Proof of completion certificates for inspection. The links are accessed via web pages, and they are:
- **Prevent awareness e-learning:** the Home Office has developed three e – learning modules
- <http://www.elearning.prevent.homeoffice.gov.uk/> An introduction to the Prevent Duty
- <https://www.elearning.prevent.homeoffice.gov.uk/preventreferrals> Informs staff to make referrals that are robust, informed and with good intent
- https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html Aimed at staff who may be asked to contribute to or sit on a Channel panel.
- All other Oxford Guardian staff complete initial Safeguarding training and refresher courses every 2 years or by request if earlier and that a record of this training is maintained.
- Any identified weaknesses in Oxford Guardians’ Child Protection procedures are remedied immediately as a priority.
- Child Protection policies and procedures are reviewed annually, and the Child Protection policy is available on Oxford Guardians’ website and in the staff handbook.
- Enhanced DBS checks are in place for all Oxford Guardians’ staff, including Homestay Hosts live in family members and taxi services used to transport children and young people.

2.2 The Lead and Deputy DSLs are members of the Senior Management Team and include an Oxford Guardians’ Director. These individuals have undertaken the relevant training and, upon appointment will undertake face to face ‘Designated Safeguarding Lead’ training followed by biannual updates.

2.3 Oxford Guardians local Guardians and DSLs are the first point of contact for Host Families, Parents, Students and staff, including staff in schools. The DSLs are also responsible for providing the information to enable local guardians to liaise with the relevant LSPs and Local Authority Designated Officers (LADOs), appointed by the Social Services Department, as well as with the Designated Safeguarding Leads appointed by the School or College attended by the child/young person in guardianship. This information is contained in the OG Database InlocoParentis or ILP under the Students/ Schools tabs

2.4 Oxford Guardians DSLs are responsible for maintaining an on-going training programme in Safeguarding and Child Protection for all Oxford Guardians’ staff and all Primary Carers in Homestay placements and for keeping records of training of Oxford Guardians staff up to date.

2.5 Oxford Guardians personnel involved in recruitment will comply with the statutory guidance on Safer Recruitment as detailed in ‘Keeping Children Safe in Education’ and will adhere to the separate Oxford Guardians’ Policy on Safer Recruitment.

2.6 All members of Oxford Guardians’ staff are provided with child protection awareness-raising information at induction so that they know how to identify a potential safeguarding issue and with whom to discuss any concerns they may have about a child/young person in their care. See Appendices 1 through 5 for further information about specific Child Protection issues.

2.7 All members of Oxford Guardians' staff are trained and receive regular updates in e-safety and reporting concerns.

2.6 All Oxford Guardians' staff have child protection awareness training, updated by the Oxford Guardians' DSLs as appropriate, to maintain their understanding of the signs and indicators of abuse or exploitation and their knowledge of what to do in the event of a child/young person in their care making a disclosure of abuse.

2.7 All members of Oxford Guardians' staff know how to respond to a child in their care who discloses abuse.

2.8 All Oxford Guardians' Homestay Hosts are made aware of their responsibilities with regard to child protection through publication of Oxford Guardians' Child Protection Policy (subsumed within this Safeguarding Policy).

2.9 Oxford Guardians' DSLs will ensure that child protection concerns or allegations against adults working in the schools attended by the children in our care are referred to the school's DSL, the LSPs and/or the police for advice and that any member of OG staff found unsuitable to work with children will be notified to the Disclosure and Barring Service (DBS) for consideration for barring, following resignation or dismissal or when Oxford Guardians cease to use their service as a result of a substantiated allegation.

2.10 Oxford Guardians' procedures will be regularly reviewed and up-dated annually as a minimum.

2.11 The names of Oxford Guardians' Designated Safeguarding Leads will be clearly displayed on our website with a statement explaining their role in referring and monitoring cases of suspected abuse.

2.12 All new members of staff will be given a copy of our safeguarding statement and child protection policy with the DSLs' names clearly displayed as part of their induction into Oxford Guardians.

2.13 A policy statement is available publicly on Oxford Guardians' website or by other means. Parents/carers are made aware of this policy and their entitlement to have a copy of it in full via our handbook/website.

Section 3.0: Responsibilities

3.1 Responsibilities: All Staff

3.1.1 All Oxford Guardians' staff have a role in Safeguarding and Child Protection and in ensuring that appropriate provision is in place to ensure the social and emotional welfare needs of the children and young people in their care are met: Safeguarding and Child Protection are everyone's business.

3.1.2 All Oxford Guardians' Homestay Hosts are responsible for providing a safe environment for the children and young people in their care supervised by the Local Guardian.

3.1.3 All Oxford Guardians' Homestay Hosts must, in line with their Safeguarding and Child Protection training, follow documented procedures where a child/young person makes an allegation of abuse and/or where they have concerns about possible abuse. Concerns must be reported to the Oxford Guardians' DSLs in a timely manner that reflects the serious nature of abuse.

3.1.4 Where there are concerns, any member of the Oxford Guardians team can make a referral to their local Children's Services as per the current statutory guidance.

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

If staff do this themselves, they should also inform the OG DSL or Deputy DSL as soon as is practicably possible.

3.1.5 Where a child is at immediate risk of harm, OG staff should phone the police on 999 and then follow documented procedures.

3.2 Responsibilities: Oxford Guardians' Designated Safeguarding Leads

The Oxford Guardians' Designated Safeguarding Leads (DSLs) are responsible for:

3.2.1 Maintaining a record of contacts (LADO, Social Services, LSP) in each of the Local Authority areas in which there are children/young people who are being cared for by Oxford Guardians. Each area LADO / LSP contact details may be found by core staff in the OG DB under the students/schools tab and in students ILP profiles. The following link is a list of LSP in England and Wales. <https://www.childprotectionuk.co.uk/local-safeguarding-children-boards-for-england-and-wales>

3.2.2 Referring a child to the LSP i.e. local Social Services, LADO and/or the police if there are concerns about possible abuse and acting as a focal point for staff to discuss concerns they may have. Referrals should be made in writing following a telephone call using the Multi Agency Referral Form (the form relevant to the county / borough in which the child/young person is schooled can be found online).

3.2.3 Keeping written records of concerns about a child/young person even if there is no need to make an immediate referral. This is discussed by the Director with the DSL/ DDSL at the weekly core staff meeting as a standing agenda item.

3.2.4 Ensuring that all such records are kept confidentially and securely in accordance with the principles of the amended Data Protection Act 2018 and UKGDPR until the child's 25th birthday and are copied to the DSL in the child's/young person's school or college. The Safeguarding logs are held in process and when completed in a password protected folder on drop box and are accessed only by the DSL/ DDSL and persons who need to know.

3.2.5 Ensuring that an indication of the existence of the additional file in 3.2.3 above is marked on the child's/young person's records. Guardians have a protected reporting space on ILP in student specific Journals.

3.2.6 Liaising with other agencies and professionals as appropriate.

3.2.7 Ensuring that either they or the staff member attend case conferences, core groups or other multi-agency planning meetings, contribute to assessments and provide a report which has been shared with the parents.

3.2.8 Ensuring that any student with a current child protection plan who is absent from the educational setting or from our care or supervision without explanation for two days is referred to their local Social Care Team/Locality Team. This is primarily the responsibility of the school the child/young person is attending but Oxford Guardians' staff will also undertake to check this has been done and that the parents have been informed.

3.2.9 Organising child protection induction and update training every 3 years for all Oxford Guardians' staff and maintaining a record of such training.

3.2.10 Providing an annual report for Oxford Guardians' Directors detailing any changes to the policy and procedures; training undertaken by the DSLs and by all staff; summarising the number and type of incidents/cases; and number of children/young people who have been placed on the child protection register (anonymised).

Section 4.0: Supporting Children and Young People

4.1 We recognise that a child or young person who has experienced abuse or exploitation or who has witnessed abuse or violence may feel helpless and humiliated, may blame themselves and may find it difficult to develop and maintain a sense of self-worth.

4.2 We recognise that Oxford Guardians' host families may provide important stability in the life of a child/young person who has been abused or who is at risk of harm as well as peace of mind for the child's/young person's parents.

4.3 We accept that research shows that the behaviour of a child/young person who has been abused may range from that which is perceived to be 'normal' to more aggressive or withdrawn behaviours.

4.4 Oxford Guardians will support all children and young people in our care by:

- Encouraging self-esteem and assertiveness through our relationships with the children and young people in our care whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the homestay placement and through regular contact e.g. by email with the children/young people in our care.
- Liaising and working together with other support services and agencies involved in the safeguarding of children.
- Notifying Social Care and/or the police as soon as there is a significant Child Protection concern about a child/young person.

- Providing continuing support to a child/young person about whom there have been concerns by ensuring that appropriate information is copied under confidential cover to the child's new educational setting and ensuring that any medical records held by the previous school are forwarded as a matter of priority.

4.5 Sources of support and guidance are listed in Appendix 8

4.6 Local Safeguarding Partnerships (LSPs). Oxford Guardians will liaise with their Local Safeguarding Partnership (LSP) and work in partnership with other agencies in line with *Working Together to Safeguard Children*.

4.7 Partner schools have their own safeguarding policies. These can be found on their website and will include the contact details for their LSP and re-linked to in the school section of the student's profile on ILP. Oxford Guardians recognises that if any safeguarding concerns occurred whilst a student was in a homestay that was out of the school's county then a different/additional LSP arrangement would be required as well. In this case, will contact the relevant LSP and follow their procedures. This website provides a link to all of the LSPs in the country: <https://www.childprotectionuk.co.uk/local-safeguarding-children-boards-for-england-and-wales>

4.8 The Company is aware of how to access local agency contacts; this includes Local Safeguarding Partnerships across the country and how to access locally agreed inter-agency procedures and guidance. In addition, the company is aware of the non-emergency reporting procedures via the Local Authority's Children's Services relevant to the area or Multi-Agency Safeguarding Hub LSP (MASH), or by telephoning the non-emergency Police number 101. For emergency situations, the company is aware of the need to contact the relevant police force for the area by dialling 999, this includes in Wales and Police Scotland.

Section 5.0: Confidentiality and Information-Sharing

5.1 We recognise that all matters relating to child protection are confidential.

5.2 Oxford Guardians' DSLs will disclose any information about a child to other members of Oxford Guardians or School staff on a need to know basis only and in accordance with the non-statutory Government guidance [Information-Sharing Advice for Safeguarding Practitioners](#) (2015)²

5.3 All Oxford Guardians' staff must be aware that they have a responsibility to share information with other agencies in order to safeguard children³. If there is any doubt about whether or not specific information should be shared, Oxford Guardians' staff should seek

² The most important consideration is whether sharing particular information with a third party is likely to help safeguard and protect a child.

³ Local Safeguarding Children Boards (LSCBs) were established by the [Children Act 2004](#) and give a statutory responsibility to each locality to have this mechanism in place, however, The Children and Social Work Act 2017 (the Act) replaced Local Safeguarding Children Boards (LSCBs) with new local safeguarding arrangements (Local Safeguarding Partners or LSP), led by three safeguarding partners, i.e. local authorities, chief officers of police, and clinical commissioning groups).

advice from an Oxford Guardians' DSL without disclosing the identity of the individual where possible.

5.4 All Oxford Guardians' staff must be aware that sensitive personal information about a child is confidential and should not be shared with or made available to others except in relation to safeguarding and child protection concerns (see 5.2 and 5.3).

5.5 Oxford Guardians' staff undertake to share information with informed consent where appropriate and, where possible, to respect the wishes of those who do not consent to share confidential information. Oxford Guardians' staff may still share information without consent if, in their judgement, there is good reason to do so, such as where a child or young person's safety may be at risk. Judgements should be based on the facts of the case in hand. Where Oxford Guardians' staff are sharing with or requesting personal information about a child/young person from, a third party they should be certain of the basis upon which they are doing so. Where they have consent, Oxford Guardians' staff should be mindful that an individual might not expect information to be shared.

5.6 Oxford Guardians' DSLs must keep a record of their decision and the reasons for it whether it is to share information or not. If an Oxford Guardians' DSL decides to share information in the interests of safeguarding a child/young person, then a record of what has been shared, with whom and for what purpose must be kept.

5.7 All Oxford Guardians' staff must be aware that they must not promise a child to keep things secret which might compromise the child's safety or wellbeing.

5.8 Oxford Guardians will always share an intention to refer a child to social care/police with their parents/carers unless to do so could put the child/young person at greater risk of harm or impede a criminal investigation.

5.9 Oxford Guardians' staff must notify an Oxford Guardians' DSL if there are concerns about the conduct or behaviour of individuals with whom a child/young person comes into contact, including where that contact is online.

5.10 Where there are concerns about the conduct or behaviour of an Oxford Guardians' DSL, these should be notified to the police. See Section 8.0: Whistleblowing.

5.11 Liaison with parents/ agents and partner schools

- The guardianship organisation may be required to share confidential safeguarding information with the DSL of the school or college that the student attends. When a student moves school or college, safeguarding information may be shared with the DSL of the new school. All schools and colleges have their own safeguarding and child protection policies that outline their procedures. These can be found on their websites.
- Whilst the guardianship organisation will work openly with parents as far as possible, it reserves the right to contact the LSP or the police, without notifying parents if this is believed to be in the child's best interests.

- Oxford Guardians will not usually share safeguarding information with agents unless it is necessary to safeguard the student. In this case information will be provided on a need-to-know basis and on the understanding that it should be kept strictly confidential.

Section 6.0: Supporting Staff

6.1 Oxford Guardians recognises that staff who have become involved with a child/young person who has suffered harm, or who appears to be likely to suffer harm, may find the situation stressful and upsetting.

6.2 Oxford Guardians' DSLs will support such staff by providing an opportunity to talk through their anxieties with and to seek further support as appropriate or necessary.

6.3 Oxford Guardians' DSLs will ensure that Oxford Guardians' staff who have reported concerns about a child/young person receive as appropriate updates about the actions that have been taken subsequently in relation to safeguarding that child/young person.

6.4 Where allegations have been made against a member of Oxford Guardians' staff, support will be offered to that person whilst investigations are carried out. During the time when investigations are being carried out, the member of Oxford Guardians' staff concerned will be relieved of their guardianship responsibilities.

Section 7.0: Allegations against staff

It is vital that Oxford Guardians' staff are confident in being able to raise concerns about what seems to be unacceptable or unsafe conduct towards other colleagues or children/young people in their care. Concerns that are raised should be listened to fairly and equally with all allegations taken very seriously.

Oxford Guardians are required to self-report to AEGIS any significant safeguarding concerns or situation which could appear compromising or be misconstrued, or where behaviour has fallen below expected standards. Reporting will be the responsibility of the director, DSL or the senior management team.

7.1 Oxford Guardians' staff should take care not to place themselves in a vulnerable position with a child or young person in their care and should be mindful of the child/young person's right to privacy.

7.2 All Staff should be aware of and follow Oxford Guardians' policies on Behaviour Management and Staff Conduct.

7.3 Guidance about conduct and safe practice, including safe use of ICTs including mobile phones by staff, will be given at induction.

7.4 Allegations made to Oxford Guardians' Staff

7.4.1 Oxford Guardians understand that a child/young person may make an allegation against a member of staff who works at the school they attend or against an adult or other person in relation to a Homestay arrangement.

7.4.2 If such an allegation is made, or if information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or being made aware of the information will immediately inform an Oxford Guardians' DSL.

7.4.3 Oxford Guardians' Directors on all such occasions will discuss the allegation with the Local Authority Designated Officer (LADO).

7.4.4 If the allegation is about the Oxford Guardians' DSL, then the incident should be reported to the Oxford Guardians' Deputy DSL.

7.4.5 If the allegation made to a member of staff concerns Oxford Guardians' Director, the person receiving the allegation will immediately inform the Police and Local Authority Designated Officer (LADO), without notifying Oxford Guardians' Director first.

7.4.6 If it is not deemed necessary to involve the police or children's social care in an incident, then the Local Authority Designated Officer (LADO) should be involved in the immediate discussion with Oxford Guardians' DSL/Director to confirm next steps. The LADO should be made aware of the incident within one working day.

7.4.7 In most circumstances the options available for Oxford Guardians are: no further action dismissal to discontinue the use of the service. The severity of the allegation, information, and evidence available can often determine the next stages taken.

7.4.8 Oxford Guardians will follow statutory guidance for managing allegations against staff. Under no circumstances will a child or young person be sent to a Homestay home pending such an investigation unless such advice is given exceptionally as a result of a consultation with the LADO/Police.

7.4.9 Suspension of a member of Oxford Guardians' staff (excluding the Director) against whom an allegation has been made needs careful consideration and the Director will seek the advice of the LADO in making this decision.

7.4.10 In the event of an allegation against Oxford Guardians' Director, the decision to suspend will be made by the police and/or the DBS.

7.5 Allegations made to Police or Children's Social Care

Oxford Guardians recognises that a child/young person, or their parent(s), may make a disclosure to a member of staff at the school they attend which may subsequently impinge on the role of a member of Oxford Guardians' staff and/or on an Oxford Guardians' Host either because they or another person with whom they have come into contact whilst on a Homestay placement are the subject of the allegation or because they may be party to any measures put in place to safeguard the child as a result of an allegation against someone else.

7.5.1 Allegations made to the police should be passed straight to the force's designated liaison officer, who will immediately contact the LADO. This is also the case if an incident is reported to Children's Social Care.

7.5.2 The LADO will pursue the allegation with the school and also with Oxford Guardians DSLs (where relevant) to obtain further details of the incident(s) and circumstances. This liaison should determine whether or not the allegation is substantiated.

7.5.3 If the allegation is upheld and there is cause for concern that a child/young person is suffering, at risk of, or likely to suffer significant harm, then the LADO should refer immediately to Children's Social Care and initiate a strategy discussion. The LADO and Oxford Guardians' Directors/Senior Management should be involved in the loop of activity and outcomes.

7.5.4 If a criminal offence has occurred then the LADO should immediately involve the police and decide whether or not an investigation is needed. Oxford Guardians' Directors/Senior Management should be involved in any such discussion.

7.5.5 Oxford Guardians' DSLs must make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned⁴.

7.5.6 In cases where the allegation does not involve a criminal investigation this should be dealt with internally as a matter of urgency by Oxford Guardians' Senior Management and may include a review of Safeguarding and Child Protection training for staff.

7.6 Allegations made to School Staff

7.6.1 A child or young person, or their parent(s), may make a disclosure about their Oxford Guardian Homestay Host or about another person with whom they have come into contact whilst on a Homestay placement to a member of staff at the school they attend. Should this occur, and unless there is an allegation involving a criminal offence, the School DSL should contact an Oxford Guardians' DSL to discuss concerns.

7.6.2 The Oxford Guardian's DSL, on receiving such contact from a school, should investigate the allegation as a matter of urgency and should also inform the child/young person's parents.

⁴ Failure to notify the DBS service in appropriate circumstances is a criminal offence.

7.6.3 During the time when investigations are being carried out, the member of Oxford Guardians' staff concerned will be relieved of their guardianship responsibilities and alternative arrangements will be made for the child/young person concerned.

Section 8.0: Whistleblowing

Oxford Guardians' Whistle-blowing policy is guided by Lord Nolan's Second Report of the Committee on Standards in Public Life, or the Public Interest Disclosure Act 1998.

[Whistleblowing for employees: What is a whistleblower - GOV.UK](#) Staff seeking external advice on whistleblowing should contact the charity Public Concern at Work Tel: 0207 4046609 <http://www.pcaw.org.uk>. Helpline 0203117 2520. Alternatively, staff can call NSPCC on 0800 028 0285 (working hours) or email at Help@nspcc.org.uk ; or can contact Protect on 020 3117 2520 or visit their website: www.protect-advice.org.uk

8.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so and we are committed to the highest standards of professional conduct. All staff who have serious concerns about any aspect of their work have a right and duty to come forward and express those concerns without fear of reprisal, victimisation or harassment. In most cases, concerns or complaints will be dealt with through other procedures, such as those for resolving grievances, disciplinary matters or concerns relating to discrimination. However, in some cases, it is recognised that staff will want to come forward on a confidential basis (whistleblowing). This policy makes it clear that this can be done without fear of reprisal, victimisation or harassment.

8.2 All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside Oxford Guardians, staff should speak in the first instance to the LADO or to the police, following the Whistle-blowing Policy.

8.3 Oxford Guardians will ensure that every new member of staff is made aware of all requirements and expectations outlined in our handbooks and policies. Staff are protected when they make a disclosure of information which they reasonably believe indicates one or more of the following matters:

- a criminal offence has been committed, is being committed or likely to be committed
- a colleague has failed, is failing, or is likely to fail to comply with any legal obligation to which he/she is subject
- a miscarriage of justice has occurred, is occurring or is likely to occur
- the health and safety of any individual has been, is being or is likely to be endangered
- the environment has been, is being or is likely to be damaged
- that any of these matters has been, is being or is likely to be deliberately concealed.

It should be noted that in making a disclosure the member of staff must have a reasonable belief that the information disclosed shows one or more of the matters listed above. The belief need not be correct, but the member of staff must show that he/she held the belief and that it was a reasonable belief in the circumstances at the time of the disclosure. The only additional requirement on the member of staff is that he/she should act in good faith. Oxford Guardians will not tolerate malicious or vindictive disclosures and if such a disclosure is made the individual(s) involved will be subject to action under disciplinary procedure.

In addition to the above, Oxford Guardians expects and encourages staff to come forward with disclosures if they suspect:

- fraud, corruption or malpractice
- failure to deliver approved standards of Child Protection
- damaging personal conflicts at senior level
- bullying, discrimination, harassment or victimisation in the workplace
- serious breaches of the standards set out in Oxford Guardians' staff handbook or Code of Conduct.

8.4 Oxford Guardians' Directors, when notified of a concern, will:

- ensure that concerns raised are taken seriously
- where appropriate, investigate properly and make an objective assessment of the concern
- keep the member of staff advised of progress
- ensure that necessary action is taken.

8.5 Whistle-blowing concerns about the conduct or behaviour of Oxford Guardians' Directors should be addressed to the police and the DBS should also be notified.

8.6 Oxford Guardians recognise that the law protects employees against unfair dismissal or being subjected to detriment as a result of a protected disclosure. If anyone tries to prevent a member of staff from coming forward to express a concern, this may be treated as a disciplinary offence.

8.7 In most cases, the member of staff should raise any concerns with one of Oxford Guardians' Directors. If necessary, the member of staff should ask for a confidential meeting. These concerns should be put in writing and include, if possible, some background, relevant dates and the reason why the situation has caused concern. The recipient of the information will acknowledge the concern within 48 hours. If a meeting or interview is held to discuss the concern, this will usually be done within 14 days. At this meeting, the member of staff raising the matter may be accompanied by a work colleague or a qualified trade union official.

Section 9.0: Physical Intervention

9.1 We acknowledge that staff must only ever use physical intervention as a last resort, when a child/young person is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person.

9.2 Such events should be recorded and signed by a witness.

9.3 We cannot envisage a situation where Oxford Guardians' staff are likely to need to use physical intervention except to save the child from harm. Indeed, should a child be so ill disciplined then they will simply be removed from the Homestay accommodation or situation prior to informing the child's parents and arranging to withdraw guardianship facilities and or return to school/home.

9.4 We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

9.5 We recognise that touch is appropriate when working with children and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.

Section 10.0: Anti-Bullying

10.1 Oxford Guardians' policy on anti-bullying acknowledges that to allow or condone bullying may lead to action under child protection procedures. This includes all forms of bullying such as cyber, racist, homophobic and gender-related bullying. Oxford Guardians acknowledges that bullying, especially if left unaddressed, can have a devastating effect on individuals, having serious consequences for their mental health and can be a barrier to their learning and personal development. Bullying does not only affect an individual during childhood but can have a lasting effect on their lives well into adulthood too. By ensuring our staff are aware of what constitutes bullying and working with our partner schools to prevent and tackle bullying, we help to create a safe environment for our students to be able to reach their full potential.

10.2 Bullying is defined as a behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. It is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual, or perceived, differences between children.

10.3 Many experts say that bullying involves an imbalance of power between the perpetrator and the victim making it difficult for the victim to defend themselves. The imbalance of power can involve different aspects, including physical, psychological (e.g. knowing what upsets someone), an intellectual imbalance, or by having the support of a group, or the ability to socially isolate someone. This can result in the intimidation of an individual or group through the threat of violence or by isolating them physically or online. Low-level disruption and the use of offensive language can also have a significant impact; if left unchallenged or dismissed as 'banter' it can lead to a reluctance to report other behaviour.

10.4 Should a member of staff, Guardian or homestay become aware that a student under the care of Oxford Guardians has been the target of bullying or has been responsible for the bullying of someone else, the DSL and DDSL should be informed. They will then communicate with the relevant DSL/DDSL at the student's school. Staff members should be aware that they be requested to take part in meetings with the DSL of the student's school. The staff member should continue to support the student who has made the disclosure to them and to report any updates to the DSL as appropriate. If they learn that the bullying has continued after all parties believe it to be resolved, they should alert the DSL immediately.

10.5 Oxford Guardians' DSLs will keep a record of all reported bullying incidents.

10.6 All Oxford Guardians' staff are made aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/becoming victims of abuse.

10.7 Gender Questioning The ‘Children who are lesbian, gay, bisexual, or gender questioning’ section is under review pending the outcome of the Gender Questioning Consultation due to report in 2025.

10.8 Cyber Bullying Oxford Guardians have a separate Online Safety Policy. Cyberbullying is bullying that takes place online and the NSPCC list covers, inter alia cyber bullying and staff responsibilities for online safety and potential misuse.

- Threatening and abusive text or Whatsapp messages.
- Creating hate groups.
- Creating fake accounts to pretend to be someone else to cause harm to others in the other person’s name.
- Sexting.
- Encouraging suicide or self-harm.
- Grooming for sexual purposes.
- Shaming someone online.
- Trolling – the sending of upsetting messages on social networks, chat rooms or online games
- Excluding children from online games activities or friendship groups
- Creating false accounts to enable ID theft.
- Pressuring children to send sexual images or engaging in sexual conversations

10.9 We will investigate any bullying or cyber-bullying concerns that are reported to us. Students are briefed during their initial guardians meeting and in the student handbooks issued in advance of entering into a homestay or guardians care, that they can speak to the homestay hosts, guardians school staff or the DSL/DDSL about any concerns they have. We may receive a report of suspected online abuse from a student, parent or other source by personal disclosure email or telephone call. This will be recorded within 24 hours on the students InlocoParentis (ILP) folder or in an encrypted email to alert The DSL/DDSL. The DSL will discuss with the Guardian / Homestay Host /School DSL the substance of the allegation and open a Safeguarding/ Bullying Report which will be updated regularly and kept in the Dropbox Encrypted Safeguarding folder.

If a homestay host or member of the family is involved The DSL will investigate and may arrange for alternative accommodation. Where there is ‘reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm’ advice will be sought from the LADO and the case referred to the LSP.

10.10 The DSL/DDSL will keep all safeguarding/ bullying records up to date until resolved and secure them in an encrypted folder in the Company Dropbox

Section 11.0: Racist Incidents

11.1 Our policy on racist incidents acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

11.2 Oxford Guardians’ DSLs are to keep a record of reported racist incidents in a protected folder in the Dropbox and all such reports are investigated.

Section 12.0: Children Missing Education

12.1 Unexplainable and/or persistent absence from education is a potential indicator of trafficking, abuse or neglect. School/college staff should follow the school's or college's procedures for dealing with children that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care_3_.pdf

12.2 Oxford Guardians recognise that a child/young person may go missing⁵ from school or from a Homestay placement and that the child/young person will be in a position of significant risk to themselves should this occur. It is not common to run away from a school or Homestay more than once, but it is not an unlikely scenario either. The following advice is intended to cover most feasible situations including long term placement in a PFA.

12.2 Children may run away **from** a problem, such as abuse, neglect or challenge at home, or **to** somewhere they want to be/someone they want to be with. They may have been coerced to run away by someone else. There are particular concerns about the links between children running away/going missing and the risks of sexual exploitation.

12.3 The risks faced by young people are the same regardless of how often they have run away from home. However, younger children could be more likely to face serious, long term problems.

12.4 Oxford Guardians' Homestay Hosts/Guardians, DSLs should, before reporting a child as missing, make proactive attempts to locate the child/young person and keep a record of the steps they have taken to trace the child/young person's whereabouts so this information can be passed on to the police if necessary. Proactive attempts to locate the child or young person should include:

- Physical checks of the residence, including the child's bedroom and any other location the child may be hiding within the house/building.
- Physical checks of any garden, garage, sheds, grounds and surrounding area(s).
- Attempting to contact the missing child/young person directly via mobile phone, text, or social networking sites (Twitter/Facebook/WhatsApp etc.)
- Contacting the missing child/young person's wider family and friends to ascertain if the child or young person is there or has contacted them.

12.5 Where such enquiries do not establish the whereabouts of the child/young person, the reporting individual should then report the incident to the Police. Unless there is deemed to be a serious concern or risk of immediate harm which would require a 999 response, this should be done through 101.

⁵ Police definitions of key terminology are: "missing": anyone whose whereabouts cannot be established and where the circumstances are out of character, or the context suggests the person may be subject of crime or at risk of harm to themselves or another; and "absent": a person not at a place where they are expected or required to be.

12.6 Where the reporting individual is a Homestay Host, they should then contact an Oxford Guardians' DSL.

12.7 Oxford Guardians' DSLs undertake to:

- Ensure all appropriate agencies and individuals, including the police, parents and schools, are notified if a child/young person is missing or absent and on their return.
- Engage with a clear plan of effective inter-agency action to trace or return children and young people who run away or go missing.

Take appropriate and effective actions when children and young people return or are located. This includes provision of a return interview and on-going support where required.

- Gather and share information to support the reporting requirements of the [statutory guidance](#) which includes the Local Safeguarding Children Board (LSCB), Council Members and the DofE, and also to inform local practice.
- Encourage and support children and young people to engage with and influence the outcome of any professional intervention.
- Work to protect and prevent vulnerable children/young people from going missing or absent.
- Provide effective and early intervention and prevention strategies to help reduce the potential of repeat occurrences.
- Ensure that all new members of staff receive safeguarding training that explains the potential vulnerability of all categories of missing or absent children and the procedures to follow.

When a child/young person is found

12.8 When a child is found, they must be offered an independent return interview. Independent return interviews provide an opportunity to uncover information that can help protect children from the risk of going missing again, from risks they may have been exposed to while missing or from risk factors in their school, Homestay placement or family home.

12.9 The return interview should be carried out within 72 hours of the child returning to their home or care setting. This should be an in-depth interview and is normally best carried out by an independent person (i.e. someone not involved in caring for the child/young person) who is trained to carry out these interviews and is able to follow-up any actions that emerge. Children sometimes need to build up trust with a person before they will discuss in depth the reasons why they ran away.

12.10 The interview and actions that follow from it should:

- identify and deal with any harm the child has suffered – including harm that might not have already been disclosed as part of the 'safe and well check' – either before they ran away or whilst missing.
- understand and try to address the reasons why the child ran away.
- help the child feel safe and understand that they have options to prevent repeat instances of them running away.
- provide them with information on how to stay safe if they choose to run away again, including helpline numbers.

12.11 The interview should be held in a neutral place where the child/young person feels safe. The interview provides an opportunity hear from the child/young person about why they went missing and to understand the risks and issues faced by the child/young person while missing. This could include exploring issues where a child:

- has been reported missing on two or more occasions.
- is frequently away from their Homestay placement or their school without authorisation.
- has been hurt or harmed while they have been missing.
- is at known or suspected risk of sexual exploitation or trafficking.
- is at known or suspected risk of involvement in criminal activity or drugs.
- has contact with people posing risk to children.
- has been engaged (or is believed to have engaged) in criminal activities while missing.

12.12 The assessment of whether a child might run away again should be based on information about:

- their individual circumstances, including family circumstances.
- their motivation for running away.
- their potential destinations and associates.
- their recent pattern of absences.
- the circumstances in which the child was found or returned.
- their individual characteristics and risk factors such as whether a child has learning difficulties, mental health issues, depression and other vulnerabilities.

12.13 Following the safe and well check and independent return interview, local authority children's services, police and voluntary services should work together:

- to build up a comprehensive picture of why the child went missing.
- to understand what happened while they were missing.
- to understand who they were with when they were missing and where they were found.
- what support they require upon returning to school or to their Homestay placement in accordance with the 'Working Together' guidance.

12.14 Safe and well checks and independent return interviews provide an opportunity to inform case planning, for wider strategic planning and for professionals to consider children's views. The outcomes of the checks and interviews should therefore be recorded on case files so that they can shared with professionals.

12.15 Where children refuse to engage with the independent interviewer, parents and carers should be offered the opportunity to provide any relevant information and intelligence of which they may be aware. This should help to prevent further instances of the child running away and identify early the support needed for them.

12.16 All Oxford Guardians' staff should be alert to signs to look out for which may precede a child/young person going missing and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, [FGM](#) and [forced marriage](#).

Section 13.0: Prevention of harm

13.1 We recognise that Oxford Guardians plays a significant part in the prevention of harm to the children and young people in our care by providing good lines of communication with trusted adults, supportive friends and an ethos of protection in which welfare concerns are paramount.

13.2 Oxford Guardians' community will therefore:

- Work to establish and maintain an ethos where children and young people feel secure, are encouraged to talk and are always listened to.
- Include regular consultation with children and young people e.g. through asking children and young people about their experiences at school and about their experiences of their homestay arrangements.
- Ensure that all children and young people know they can approach a member of Oxford Guardians' staff if they are worried or in difficulty.
- Support safeguarding through monitoring children and young people and supporting them to develop their awareness of their personal safety, including online safety, and growing independence e.g. in participation in various activities and travel.
- Ensure all Oxford Guardians' staff are aware of guidance around their use of internet/mobile technologies and have received training on safeguarding issues around the use and availability of mobile technologies and their associated risks during homestays.

Section 14.0: Health & Safety

14.1 Oxford Guardians' Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of the children and young people in our care

a) physically within the homestay environment, when away from the school and when undertaking trips, visits and other activities as part of a homestay arrangement and

b) socially and emotionally in relation to harm that may be caused by mobile technologies and social media, including risks associated with radicalisation and extremism.

Section 15.0: Monitoring, Evaluation and Review

Oxford Guardians' Safeguarding and Child Protection Policy and Procedures will be monitored and evaluated by:

- Senior Leadership liaison with the schools attended by children/young people in the care of Oxford Guardians
- Reviews of Oxford Guardians' induction procedures for new staff
- Surveys and questionnaires to gather feedback from the children and young people in our care
- Parent surveys and questionnaires
- Scrutiny of a range of risk assessments
- Scrutiny of logs of safeguarding concerns
- Reviews of logs of bullying/racist/behaviour incidents
- Reviews of parental concerns and parent questionnaires

- Reviews of concerns expressed by schools attended by the children and young people in our care
- Reviews of student feedback on the care they received whilst in the care of Oxford Guardians homestay families.

Data Protection Act 2018 and the UK GDPR and the EU GDPR

The DPA 2018 and the UKGDPR place obligations and duties on organisations and individuals to process personal information fairly, lawfully and to keep the information they hold safe and secure. Oxford Guardians have a detailed separate DPA and GDPR policy. The EU GDPR was originally incorporated directly into UK law as the UKGDPR. We have students based in the EU and therefore the EUGDPR applies to services supplied to them. However, the EU approved adequacy decisions on 28 June 2021 this means data from the EU can flow as before in the majority of circumstances.

Date Reviewed	Reviewer	Next Review
27/10/2020	KT Bacon DSL	27/10/2021
22/02/2021	KT Bacon DSL	22/02/2022
15/04/2021	KT Bacon DSL	15/04/2022
13 Aug 2022	KT Bacon DSL	15/08/2023
21/09/2023	KT Bacon DSL	09/2024
01/12/2024	KT Bacon DSL	12/2025

Date Reviewed	Reviewer	Next Review
27/10/2020	A Dyer DDSL	27/10/2022
22/02/2021	A Dyer DDSL	22/02/2022
15/04/2021	A Dyer DDSL	15/04/2022
13/08 2022	A Dyer DDSL	14/08 /2023
25/09/2023	A Dyer DSL	09/2024
05/01/2025	A Dyer DSL	12/2025

Appendix 1

Recognising signs of child abuse, neglect or exploitation

We recognise that abuse may occur in school or in a homestay environment, although given our structure of local guardians of establishing a trusting relationship with a child and visiting the child at school and in the homestay environment, we believe any form of abuse would be discovered fairly quickly and acted upon. There are 4 main categories of abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse
- Neglect

Signs of Abuse in Children

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age-inappropriate sexual behaviour
- Child Sexual Exploitation.

Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated/named/lead person, manager (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and/or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent(s) relatives or carers, or of staff in school
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development or social norms that exist in other cultures).

The parent, relative, carer or Homestay may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances

NB: OG stipulate that any person visiting regularly or resident in the homestay of 16 years and over must be subject to an enhanced DBS clearance with child barring list scrutinised so the potential risk individuals previously known or suspected to have abused children moving into the household is extremely low.

Recognising Physical Abuse

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury

- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

Bruising

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence, or an adequate explanation provided:

- Two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, handprints or a hairbrush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Bite Marks

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

Burns and Scalds

It can be difficult to distinguish between accidental and non-accidental burns and scalds and these will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation.

Fractures

Fractures may cause pain, swelling and discolouration over a bone or joint. In our school / homestay scenario any fracture is normally accidental but should be investigated, nonetheless.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement

Scars

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

Recognising Emotional Abuse

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Abnormal attachment between a child and parent/relative, homestay carer e.g. anxious, indiscriminate or no attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated within the homestay
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

Recognising Signs of Sexual Abuse

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. Sexual abuse is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to manifest themselves emotionally and/or behaviourally.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation which is inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (note that this may be related to cultural norms or physical difficulties)
- Some physical indicators associated with this form of abuse are:
 - Pain or itching of genital area
 - Blood on underclothes
 - Pregnancy in a younger girl where the identity of the father is not disclosed
 - Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

Sexual Abuse by Young People

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of behaviour as developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their

physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats and/or aggression together with secrecy, or where one participant relies on exploiting an unequal power base.

Assessment

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- Consent – agreement including all the following:
- Understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society’s standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence
- Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses i.e. loss of love, friendship etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating the sexual behaviour of children and young people, the above information should be used only as a guide.

Recognising Neglect

Evidence of neglect is built up over a period of time and can cover different aspects of care. The OG structure of local guardians of establishing a trusting relationship with a child and visiting the child at school and in the homestay environment, would reveal any deficiency in level of the provision of care and would lead to immediate amelioration change of homestay. Possible Indicators include:

- Failure by homestay hosts to meet the basic essential needs e.g. adequate food, warmth, hygiene and medical care
- A child seen to be listless, apathetic and irresponsible with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss

- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child left alone for excessive periods

Appendix 2

Child Sexual Exploitation (CSE)

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to unusual locations to meet friends
- seen at known places of concern
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people or anti-social groups or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school,
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

Further guidance about Child Sexual Exploitation can be found on the [NSPCC website](#)

Appendix 3

Forced Marriage (FM)

Forced Marriage is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women from affected ethnic groups can be at risk. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours.

[The Anti-social Behaviour, Crime and Policing Act 2014](#) makes it a criminal offence to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- Marrying someone who lacks the mental capacity to consent to the marriage (whether they are pressured to or not)
- Breaching a Forced Marriage Protection Order is also a criminal offence
- The civil remedy of obtaining a Forced Marriage Protection Order through the family courts will continue to exist alongside the new criminal offence, so victims can choose how they wish to be assisted.

Difference between forced marriage and arranged marriage

There is a clear distinction between a forced marriage and an arranged marriage, in arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether or not to accept the arrangement remains with the prospective spouses.

In forced marriage, one or both spouses do not (or, in the case of some vulnerable adults, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial, sexual, financial and emotional pressure.

All practitioners working with victims of forced marriage and honour-based violence need to be aware of the “one chance” rule. That is, they may only have one chance to speak to a potential victim and thus they may only have one chance to protect the victim and prevent a forced marriage from taking place. This means that all practitioners working within statutory agencies need to be aware of their responsibilities and obligations when they come across forced marriage cases.

Keeping a victim of forced marriage safe following a disclosure of Forced marriage

Whatever someone’s circumstances, the victim has rights that should always be respected such as the right to personal safety and the right to be given accurate information about their rights and choices. Practitioners should listen to the victim and respect their wishes.

Disclosures of forced marriage should not be dismissed as merely a domestic issue – for many people, seeking help from an agency is a last resort and therefore all disclosures of forced marriage should be taken seriously.

Involving families in cases of forced marriage may increase the risk of serious harm to a person. Never attempt to intervene directly: listen to the victim and then seek advice.

For further information and guidance, see the [Government website](#).

Appendix 4

Honour based violence (HBV)

The term ‘honour-based crime’ covers any criminal offence that is driven by a mistaken desire to protect the cultural or traditional beliefs of a family or community. **It may or may not involve violence.** It is carried out in order to restore the honour of the family or community and can include:

- personal attacks of any kind, including physical and sexual violence
- murder
- forced marriage
- written or verbal threats or insults
- threatening or abusive phone calls, emails and instant messages
- Forced Marriage is a criminal offence

For more information about Honour-Based Violence, see the [MET website](#)

Appendix 5

Female Genital Mutilation (FGM)

Although the risk of coming into contact with a case of FGM is relatively small, it is essential that Oxford Guardians staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

HM Government has produced [statutory guidance](#) on FGM (April 2016). This multi-agency statutory guidance should be read and followed by all persons and bodies in England and Wales who are under statutory duties to make arrangements to discharge their functions having regard to the need to safeguard and promote the welfare of children and vulnerable adults. The following list is not exhaustive; however, such persons and bodies include:

- local authorities and district councils.
- National Health Service (NHS) and independent service providers.
- NHS England.
- NHS Wales.
- clinical commissioning groups (CCGs).
- NHS Trusts.
- NHS Foundation Trusts.
- the police. governing bodies of maintained schools and colleges.
- proprietors of independent schools (including academies, free schools and alternative provision academies) and non-maintained special schools; and
- management committees of pupil referral units (PRUs).

Professionals working in these organisations and who undertake these duties are responsible for ensuring that they fulfil their role and responsibilities in a manner consistent with the statutory duties of their employer.

The Home Office has published a series of [factsheets](#) on the protection of children and miscellaneous sections of the Serious Crime Act, which includes a factsheet on FGM. The Home Office has also produced free [online e-learning](#) on FGM

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

There are 4 types of procedure:

- Type 1 Clitoridectomy - partial/total removal of clitoris
- Type 2 Excision - partial/total removal of clitoris and labia minora
- Type 3 Infibulation - the entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4 all other procedures that may include pricking, piercing, incising, cauterising and scraping the genital area.

Why is FGM carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman/rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean/hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is illegal in most countries including the UK.

Circumstances and occurrences that may indicate FGM is likely to take place

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemen, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems

- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from their peer group
- Reluctance to take part in physical activity
- Repeated urinary tract infection
- Disclosure

For further advice and guidance and for signposting to sources of support for FGM victims, see the [NSPCC website](#).

Appendix 6

Prevent Duty

From 1 July 2015 all schools and registered childcare providers are subject to a duty under section 26 of the Counterterrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty. It applies to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to the statutory guidance. Paragraphs 57-76 of the [guidance](#) are concerned specifically with schools and childcare providers.

Links to specific training for OG DSLs are at paragraph 2.1 of the main document but are copied here for convenience

- **Prevent awareness e-learning:** the Home Office has developed three e – learning modules
- <http://www.elearning.prevent.homeoffice.gov.uk/> An introduction to the Prevent Duty
- <https://www.elearning.prevent.homeoffice.gov.uk/preventreferrals> Informs staff to make referrals that are robust, informed and with good intent
- https://www.elearning.prevent.homeoffice.gov.uk/channel_awareness/01-welcome.html Aimed at staff who may be asked to contribute to or sit on a Channel panel.

In order for schools and childcare providers to fulfil the Prevent duty, it is essential that staff are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of schools’ and childcare providers’ wider safeguarding duties and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

Schools and childcare providers can also build children/young people’s resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, schools should provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist⁶ arguments.

⁶ “Extremism” is 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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Terrorist groups very often draw on extremist ideas developed by extremist organisations.

The Prevent duty is entirely consistent with schools' and childcare providers' existing responsibilities and should not be burdensome. Ofsted's revised common inspection framework for education, skills and early years, which came into effect on 1st September 2015, makes specific reference to the need to have safeguarding arrangements to promote pupils' welfare and prevent radicalisation and extremism.

The statutory guidance on the Prevent duty summarises the requirements on schools and childcare providers in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

Risk assessment

The statutory guidance makes clear that schools and childcare providers are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them.

The general risks affecting children and young people may vary from area to area, and according to their age. Schools and childcare providers are in an important position to identify risks within a given local context. It is important that schools and childcare providers understand these risks so that they can respond in an appropriate and proportionate way. At the same time schools and childcare providers should be aware of the increased risk of online radicalisation, as terrorist organisations such as ISIL seek to radicalise young people through the use of social media and the internet. The local authority and local police will be able to provide contextual information to help schools and childcare providers understand the risks in their areas.

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. Oxford Guardians' staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour. The Prevent duty does not require teachers or childcare providers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must act when they observe behaviour of concern.

Schools and childcare providers should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools and childcare settings to have distinct policies on implementing the Prevent duty. General safeguarding principles apply to keeping children safe from the risk of radicalisation as set out in the relevant statutory guidance, [Working together to safeguard children](https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf) (2015) and https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf

Guardians and Homestay providers should understand when it is appropriate to make a referral to the Channel programme and advice may be sought at any time from the DSL

kevin@oxfordguardians.com or the DDSL lexi@oxfordguardians.com ; Tel 24 hours: 01604859331 or Tel 24 hours emergency 07800804041

The Channel Programme

Channel is a programme which focuses on providing support at an early stage to people who, after referral and a police gateway assessment, are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- a. identifying individuals at risk.
- b. assessing the nature and extent of that risk; and
- c. developing the most appropriate support plan for the individuals concerned.

Channel may be appropriate for anyone who is vulnerable to being drawn into any form of terrorism. Channel is about ensuring that vulnerable children and adults of any faith, ethnicity or background receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist related activity.

Success of the Channel programme is very much dependent on the co-operation and coordinated activity of partners. It works best when the individuals and their families fully engage with the programme and are supported in a consistent manner.

As detailed in the opening paragraph a three part e-training package is available. The modules are suitable for core staff, Guardians and Homestay providers who are encouraged to participate but which is a compulsory qualification for the DSL and DDSL. It introduces the topics covered by this advice, including how to identify factors that can make people vulnerable to radicalisation, and case studies illustrating the types of intervention that may be appropriate, in addition to Channel.

Working in partnership

The Prevent duty builds on existing local partnership arrangements. Local Safeguarding Children Boards (LSCBs) are responsible for co-ordinating what is done by local agencies for the purposes of safeguarding and promoting the welfare of children in their local area. Safeguarding arrangements should already consider the policies and procedures of the LSCB. For example, LSCBs publish threshold guidance indicating when a child or young person might be referred for support.

Local authorities are vital to all aspects of Prevent work. In some priority local authority areas, Home Office fund dedicated Prevent co-ordinators to work with communities and organisations, including schools. Other partners, in particular the police and also civil society organisations, may be able to provide advice and support to schools on implementing the duty.

Effective engagement with parents / the family is also important as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms.

Oxford Guardians Staff training

The statutory guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. The Home Office has developed a three-module e training package each of which provides a certificate of completion. In addition, guardians and homestay providers will be introduced to Prevent training during the annual Zoom based safeguarding training packages delivered by the DSL and DDSL.

IT policies

The statutory guidance makes clear the need for schools to ensure that children are safe from terrorist and extremist material when accessing the internet in schools and in Homestay accommodation. Homestay providers should ensure the home network has suitable parental control filters in place as well as reasonable limits on inessential use such as gaming.

Given the increase in online teaching and virtual classes during and since the Covid 19 pandemic, Internet safety will usually be integral to a school's ICT curriculum, but for Guardians and Homestay providers general advice on internet safety is available on the UK Safer Internet Centre website.

As with other online risks of harm, every professional involved in the care of children and young people needs to be aware of the risks posed by the online activity of extremist and terrorist groups.

Training And Helpline

Email <https://www.elearning.prevent.homeoffice.gov.uk/>

Telephone 020 7340 7264

If you are concerned about extremism in a school or organisation that works with children, or if you think a child might be at risk of extremism, contact the helpline.

Open Monday to Friday from 9am to 6pm (excluding bank holidays).

Or the NSPCC at 0808 800 5000 or email help@nspcc.org.uk

Appendix 7

Faith based abuse (child abuse linked to faith or belief)

It is highly unlikely that in the context of a boarding school or college and OG guardianship that staff or associates will come across witchcraft and spirit possession in their dealings with their charges, however this subject is included for the sake of completeness.

Certain kinds of child abuse are linked to faith or belief. These include: belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or muti murders where the

killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home.

These beliefs are not confined to one faith, nationality or ethnic community. Examples have been recorded worldwide among Europeans, Africans, Asians and elsewhere as well as in Christian, Muslim, Hindu and pagan faiths among others. Not all those who believe in witchcraft or spirit possession harm children. Data on numbers of known cases suggest that only a small minority of people with such beliefs go on to abuse children. Under-reporting of abuse is, however, likely. Data may also reflect closer scrutiny of communities in which cases typifying this kind of abuse have been seen.

There are some common features where faith or belief is a factor in abuse. Firstly, there is sometimes a wider social or community consensus that witchcraft, for example, actually exists. Sometimes a faith leader or other influential figure is at the centre, promoting the belief and methods of resolving the supposed problem by harming children. Parents or carers have also been key perpetrators in many of the known cases. This can make the abuse harder to find out about, harder to get evidence to prosecute and harder to prevent in future.

There is also the internal logic of the belief, which in the case of spirit possession, for example, is that the child is the victim of a supernatural force, and the abuse is therefore understood by perpetrators as a means of saving the child – driving out the devil – in other words perpetrators may perversely believe that they are doing the right thing. Even where there is no intention to save the child, the belief that the child can harm others can generate a real fear in those who would normally be expected to protect the child, including parents or close family. This fear that a child may cause harm to, or kill, siblings, parents and other family or friends can be a critical factor in the abuse.

In some cases, there are also real-world factors underlying the abuse. This is sometimes described as the scapegoating of children to reconcile misfortune that has occurred to the family or community, such as an adult family member becoming unemployed or being in poverty. In these situations, those who are different because they have some special traits (such as being particularly bright, having difficult behaviour, having a disability or children living away from their parents) are the target of scapegoating, being accused of having caused the misfortune by supernatural means. The most vulnerable people within a group offer the least ability to resist being scapegoated, and children are a group who are inherently vulnerable, needing protection from adults around them.

The approach to tackling this kind of abuse must be focused, as with all kinds of child abuse, on keeping the child safe and on bringing the perpetrators to justice, but it must also involve emotional and intellectual engagement with those individuals, families and in some cases faith or other communities whose belief underlies the harm. OG are clear that we do not challenge people's beliefs, but where these beliefs lead to abuse, that should not be tolerated. In addition, wider engagement with faith and other communities can help to bring shared understanding of, for example, children's rights, positive parenting and approaches to behaviour

management, disability and learning difficulties, which can help to give parents and others better ways to deal with day-to-day difficulties they face.

This introduction can only provide a brief insight into what is known about abuse linked to faith or belief. For further information, refer to the [National Action Plan to tackle child abuse linked to faith or belief](#) (DfE, 2012).

Appendix 8: Keeping Children and Young People Safe Online: Roles and Responsibilities

8.1 Homestay Hosts

8.1.1 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.

8.1.2 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.

8.1.3 Oxford Guardians' Homestay Hosts should know what devices in their homes connect to the internet and how.

8.1.4 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.

8.1.5 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 any safety settings are being applied.

8.1.6 Oxford Guardians' Homestay Hosts should use parental controls on devices that link to the internet such as 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.

8.1.7 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.

8.1.8 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.

8.1.9 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.

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

8.1.11 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.

Appendix 9

Sources of further information, guidance and support

NSPCC: www.nspcc.org.uk

Child exploitation and online protection centre (CEOP): www.ceop.gov.uk

For children and young people: Childline 0800 1111

NSPCC Share Aware Campaign (online safety): www.nspcc.org.uk/shareaware

Child exploitation and online protection centre (CEOP): www.thinkuknow.co.uk/

For parents: www.parentinfo.org/

For parents about online safety: www.childnet.com

For practitioners, children, parents and Young People re concerns about mental health including eating disorders and self-harm: <https://www.selfharm.co.uk/>

For practitioners, parents and young people re Teenage Relationship Abuse:

<http://www.refuge.org.uk/get-help-now/help-for-teenage-girls/>

<http://www.nhs.uk/Livewell/women1839/Pages/Teenrelationshipabuse.aspx>

EXTERNAL AGENCY INFORMATION

The contact details of area LSPs LADO and MASH are detailed on the Company Database under the student/school tab and in each student's school placement record. (Care Folders) Each OG Guardian is to ensure they have the relevant contact details of the local area agencies for example:

- Oxfordshire Safeguarding Children Board (OSCB): www.oscb.org.uk
 - LADO (Local Authority Designated Officer) – 01865 815956; 01865 810603
alison.beasley@oxfordshire.gov.uk Children's Social Care
 - MASH (Multi-Agency Safeguarding Hub) – 0345 050 7666 mash-childrens@oxfordshire.gcsx.gov.uk
 - Children's Social Care Team (Oxford City) – 01865 328563
 - Emergency Duty Team – 0800 833408 For issues relating to child sexual exploitation
 - Kingfisher Team (child sexual exploitation issues) – 01865 309196 For issues relating to radicalisation / extremism / Prevent
 - Thames Valley Police Prevent Officer: preventreferrals@thamesvalley.pnn.police.uk
 - For advice / information from local children's services or MASH (Multi-Agency Safeguarding Hub) – 0345 050 7666 mash-childrens@oxfordshire.gcsx.gov.uk
 - Emergency reports Anti-Terrorist Hotline – 0800 789 321 Other contacts
 - Police emergency – 999
 - Police non-emergency – 101
 - Disclosure and Barring Service (DBS) – 03000 200 190
Disclosure and Barring Service (DBS) Employers check
<https://secure.crbonline.gov.uk/crsc/check?execution=e1s1>
 - KCSIE (September 2024)
https://assets.publishing.service.gov.uk/media/66d7301b9084b18b95709f75/Keeping_children_safe_in_education_2024.pdf
- A list of LSPs LADO and social service units in England and Wales is at
<https://www.childprotectionuk.co.uk/local-safeguarding-children-boards-for-england-and-wales>

CONFIDENTIALITY OF CHILD PROTECTION RECORDS Child protection records must be kept secure and confidential, separately from other company records. They are available only to core staff and nominated Guardians for specific children on a 'need to know' basis. Initial reports maybe passed to the DSL via ILP reports and completed or ongoing reports are held in a password protected folder on our Dropbox.

Appendix 10

Name of OG Staff completing this form:

School child attends:

Child's full name:

Date of this record: dd/mm/yyyy

Where and in what context were you working with this child?

Describe:

Why are you concerned about this child?

What have you observed/heard and when?

What have you been told, by whom and when?

Is this the first time you have been concerned about this child?

Yes/No

Have you spoken to the child?

Yes/No

What did the child say? Include date, time and location. Use the child's own words in the language they used and provide an English language translation where necessary.

Have you spoken to anyone else in relation to your concerns about this child?

Yes/No

If 'Yes', name and position of the person contacted

Name:

Position:

Outcome:

Once completed, this form must be scanned and emailed to the OG DSL and DDSL. In the subject line, please write “Confidential – safeguarding concern” – do not include the child’s name.

OG DSL Kevin Bacon kevin@oxfordguardians.com

OG Deputy DSL Lexi Dyer lexi@oxfordguardians.com