

OXBRIDGE GUARDIANS

# SAFEGUARDING AND CHILD PROTECTION POLICY

This policy is to safeguard and promote the welfare of children in our care, to ensure that all actions are transparent and in the best interests of the child.

**Oxbridge Group Ltd**, trading as Oxbridge Guardians and Aspired Education  
Registered Company No. 08573744

Devas Club, 2a Stormont Road, Battersea, London SW11 5NB

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Related Documents:  
Safer Recruitment Policy  
Anti-radicalisation Policy  
Bullying and E-Safety Policy  
Health and Safety Policy  
Staff Code of Conduct  
Absent or Missing Student Policy  
Confidentiality and Information  
Sharing Policy  
Data Protection Policy  
Complaints Policy  
Whistleblowing Policy  
Private Fostering Arrangement Policy

## Contents

<b>Safeguarding &amp; Child Protection Policy .....</b>	<b>4</b>
<b>Introduction .....</b>	<b>4</b>
<b>Safeguarding Statement.....</b>	<b>4</b>
<b>Policy Background.....</b>	<b>5</b>
<b>Safeguarding and Child Protection Policy Aims .....</b>	<b>6</b>
<b>Recognising Abuse and Neglect - Definitions and Indicators .....</b>	<b>7</b>
<b>Safeguarding.....</b>	<b>7</b>
<b>Child Protection .....</b>	<b>7</b>
<b>Abuse .....</b>	<b>7</b>
<b>Physical abuse .....</b>	<b>7</b>
<b>Physical Abuse Indicators .....</b>	<b>7</b>
<b>Emotional abuse .....</b>	<b>8</b>
<b>Emotional Abuse Indicators.....</b>	<b>8</b>
<b>Sexual abuse.....</b>	<b>8</b>
<b>Sexual Abuse Indicators .....</b>	<b>8</b>
<b>Neglect .....</b>	<b>9</b>
<b>Indicators of Neglect .....</b>	<b>9</b>
<b>Child sexual exploitation .....</b>	<b>9</b>
<b>Indicators of Child sexual exploitation .....</b>	<b>9</b>
<b>Female genital mutilation (FGM) .....</b>	<b>10</b>
<b>The Mandatory Reporting Duty for FGM.....</b>	<b>11</b>
<b>Radicalisation .....</b>	<b>11</b>
<b>PREVENT.....</b>	<b>12</b>
<b>Potential indicators of radicalisation .....</b>	<b>12</b>
<b>‘Honour’ based violence.....</b>	<b>12</b>
<b>Peer on peer abuse .....</b>	<b>12</b>
<b>Sexting .....</b>	<b>13</b>
<b>Safeguarding Responsibilities .....</b>	<b>14</b>
<b>All Staff, Volunteers and Homestays.....</b>	<b>14</b>
<b>Designated Safeguarding Lead.....</b>	<b>15</b>

<b>Taking action when abuse or neglect is suspected or a complaint is made or concern raised .....</b>	<b>16</b>
<b>Being alert to signs of abuse and neglect .....</b>	<b>16</b>
<b>Questioning behaviours .....</b>	<b>16</b>
<b>Asking for help.....</b>	<b>16</b>
<b>Referring to children’s social care .....</b>	<b>17</b>
<b>Dealing with a disclosure of abuse.....</b>	<b>17</b>
<b>Dealing with concerns of neglect or abuse .....</b>	<b>18</b>
<b>Action taken by the Designated Safeguarding Lead when abuse is suspected or a complaint is made ....</b>	<b>18</b>
<b>Allegations against Oxbridge Guardians Staff / Homestays.....</b>	<b>19</b>
<b>Allegations about the Designated Safeguarding Lead (Whistleblowing) .....</b>	<b>19</b>
<b>Allegations made to Police or Children's Social Care.....</b>	<b>20</b>
<b>Allegations made to School Staff .....</b>	<b>21</b>
<b>Allegations against Children or Young People under the care of Oxbridge Guardians .....</b>	<b>21</b>
<b>Appendix 1 .....</b>	<b>22</b>
<b>Confidential Cause for Concern Form.....</b>	<b>22</b>
<b>Appendix 2 .....</b>	<b>24</b>
<b>Sources of Further Information .....</b>	<b>24</b>
<b>Appendix 3 .....</b>	<b>25</b>
<b>Communication with Oxbridge Guardians.....</b>	<b>25</b>

# Safeguarding & Child Protection Policy

## Introduction

The purpose of this policy is to make sure that the actions of any adult in the context of the work carried out by the organisation are transparent and safeguard and promote the welfare of all young people. If any parent or young person/child has any concerns about the conduct of any member of the organisation, this should be raised in the first instance with Stephanie Gilbert (Designated Safeguarding Lead - +447837778298)

In line with Keeping Children Safe in Education (2019), safeguarding and promoting the welfare of children is defined for the purposes of this policy as: “protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.”

Oxbridge Guardians recognises that safeguarding encompasses the duties of child protection and promoting the rights and welfare of children. As such:

- it is everyone’s responsibility to safeguard children
- everyone who comes into contact with children and families has a role to play
- everyone working with children must maintain an attitude of ‘it could happen here’ (Keeping Children Safe in Education, September 2019).

In line with Keeping Children Safe in Education (2019) Oxbridge Guardians recognises that:

- “Safeguarding and promoting the welfare of children is **everyone’s** responsibility. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the **best interests** of the child.”
- “No single professional can have a full picture of a child’s needs and circumstances. If children and families are to receive the right help at the right time, **everyone** who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.”

## Safeguarding Statement

Oxbridge Guardians is committed to safeguarding and promoting the welfare of children and young people and expects all staff, volunteers, homestays and any individual working with the organisation to share this commitment. This ongoing commitment to safeguarding and child protection is reflected throughout our child protection policies, our safer recruitment training and implementation, ongoing safeguarding training (initially online, then annual follow ups by email) for staff and host families and the welfare services offered to our students. Every young person in the care of Oxbridge Guardians should feel safe and protected from any form of abuse or neglect.

Oxbridge Guardians believe that:

- Guardians and Homestays can contribute to the prevention of abuse.
- All children have the right to be protected from harm.
- Children need support which matches their individual needs, including those who may have experienced abuse.
- Children need to be safe and feel safe in school and when staying with their guardian or homestay.

## Policy Background

Oxbridge Guardians will fulfil local and national responsibilities as laid out in the following documents:-

- Keeping Children Safe in Education – Statutory guidance for schools and colleges, September 2019  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/835733/Keeping\\_children\\_safe\\_in\\_education\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/835733/Keeping_children_safe_in_education_2019.pdf)
- Working Together to Safeguard Children, July 2018:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779401/Working\\_Together\\_to\\_Safeguard-Children.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf)
- Statutory Guidance on Children who Run away or Go Missing from Home or Care, January 2014: [Statutory guidance on children who run away or go missing from home or care – January 2014](#)
- What to do if you're worried a child is being abused – March 2015  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)
- Children Missing from Education – September 2016 [Children missing education – statutory guidance for local authorities – September 2016](#)
- Disqualification under the Childcare Act February 2006 (June 2016):  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/528473/Disqualification\\_under\\_the\\_childcare\\_act\\_June2016.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/528473/Disqualification_under_the_childcare_act_June2016.pdf)
- Children Act 1989 (as amended 2004 Section 52): <http://www.legislation.gov.uk/ukpga/1989/41/contents>
- Education Act 2002 s175/s157: <http://www.legislation.gov.uk/ukpga/2002/32/contents>
- The Counter-Terrorism and Security Act 2015 (section 26 The Prevent Duty)  
[http://www.legislation.gov.uk/ukdsi/2015/9780111133309/pdfs/ukdsiod\\_9780111133309\\_en.pdf](http://www.legislation.gov.uk/ukdsi/2015/9780111133309/pdfs/ukdsiod_9780111133309_en.pdf)
- Prevent Duty Guidance: for England and Wales (March 2015)  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445977/3799\\_Revised\\_Prevent\\_Duty\\_Guidance\\_England\\_Wales\\_V2-Interactive.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf)
- The Use of Social Media for On-line Radicalisation (July 2015)  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/440450/How\\_social\\_media\\_is\\_used\\_to\\_encourage\\_travel\\_to\\_Syria\\_and\\_Iraq.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/440450/How_social_media_is_used_to_encourage_travel_to_Syria_and_Iraq.pdf)
- Female Genital Mutilation Act 2015  
<http://www.legislation.gov.uk/ukpga/2015/9/part/5/crossheading/female-genital-mutilation/enacted>
- Serious Crime Act 2015 Children Missing Education – Statutory guidance for local authorities (DfE September 2016).[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550416/Children\\_Missing\\_Education\\_-\\_statutory\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2015)  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419628/Information\\_sharing\\_advice\\_safeguarding\\_practitioners.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf)

# Safeguarding and Child Protection Policy Aims

Oxbridge Guardians aims to:

- provide a safe environment for children and young people when under their care, which will help to promote their welfare and safeguard their interests;
- value all children and young people as individuals and to treat them with respect and appropriate care;
- protect each child or young person from any form of abuse, be that from an adult or from another child or young person;
- ensure that no child or young person is ever subject to any form of discrimination whilst in their care;
- support each child and young person's development in ways that will foster security, confidence and independence;
- ensure that each child or young person knows who to approach if they are in difficulties;
- deal appropriately and as quickly as possible with every suspicion or disclosure of abuse or neglect;
- be aware of the needs of the child or young person and that any action required to protect the child or young person does not where possible cause any further unnecessary distress to them;
- provide any necessary support and professional help to any children or young people who have been abused as provided within their agreed child protection plan;
- be alert to the medical needs of all children or young people in their care;
- take a carefully balanced approach to protecting children and young people whilst respecting the rights and needs of parents, guardians and homestays. If there is ever conflict as a result of these requirements the child or young person's welfare will always be paramount;
- ensure that parents and guardians have a right to respect and will be fully involved as appropriate in such matters which concern their family, subject to the appropriate duties of confidentiality;
- follow local inter-agency procedures for the Local Safeguarding Children Boards (LSCB) in the areas where they are responsible for providing a service to children and young people;
- work closely with all agencies and bodies concerned with the protection and welfare of children and young people;
- develop and promote effective working relationships with the LADO's and other social care staff in the areas where we work;
- liaise closely with the DSL at any schools or colleges where children or young people in their care attend and to ensure that schools or colleges are kept fully informed of any safeguarding or child protection concerns or allegations;
- provide all members of staff, homestays, parents and partner schools / colleges with a copy of this policy and any updates that may be required;
- raise the awareness of all Oxbridge Guardians' staff, including Homestay Hosts, of their duty to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse. This will be by online course initially, then with email updates annually (or more regularly as necessary) and in office training from the Designated Safeguarding Lead for permanent staff;
- provide a systematic means of monitoring children known or thought to be at risk of harm and to ensure Oxbridge Guardians' staff contribute to assessments of need and support packages for those children and young people;
- ensure that all Oxbridge Guardians' staff and volunteers who have access to children and young people have been checked as to their suitability for the role, including verification of their identity and a satisfactory DBS check;
- ensure a single central record of all safer recruitment checks is kept;
- ensure that we have a Designated Safeguarding Lead (DSL) and an Assistant Designated Safeguarding Lead (ADSL) who will receive appropriate training at least every two years in line with LSCB and AEGIS guidelines;
- ensure that all Oxbridge Guardians staff and homestays receive initial training in basic Safeguarding awareness and are given an annual Safeguarding update in line with AEGIS requirements;

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- ensure that a central Safeguarding record is maintained and reviewed regularly;
- ensure that any staff, volunteers or homestays who are innocent are not prejudiced by any false allegations.

## Recognising Abuse and Neglect - Definitions and Indicators

**Safeguarding** is the action that is taken to promote the welfare of children and protect them from harm.

Safeguarding means:

- protecting children from abuse and maltreatment
- preventing harm to children's health or development
- ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes.

**Child Protection** is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which detail how to respond to concerns about a child.

Safeguarding children and young people and child protection guidance and legislation applies to all children up to the age of 18.

**All staff, volunteers and homestays should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.**

**Abuse** is 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 (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

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

**Physical Abuse Indicators** may include the following (this is not designed to be used as a checklist)

- Patterns of bruising; inconsistent account of how bruising or injuries occurred
- Finger, hand or nail marks, black eyes
- Bite marks
- Round burn marks, burns and scalds
- Lacerations, wealds
- Fractures
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance

- Violence or aggression towards others including bullying
- Isolation from peers

**Emotional abuse** is 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 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.

**Emotional Abuse Indicators** may include the following (this is not designed to be used as a checklist)

- Over-reaction to mistakes, continual self-deprecation
- Delayed physical, mental, emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Masturbation, Appetite disorders - anorexia nervosa, bulimia
- Soiling, smearing faeces, enuresis
- N.B: Some situations where children stop communication suddenly (known as "traumatic mutism") can indicate maltreatment.

**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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Sexual Abuse Indicators** may include the following (this is not designed to be used as a checklist)

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate.
- Thrush, Persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia



- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusually compliant
- Regressive behaviour, Enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises, scratches in genital area

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

**Indicators of Neglect** may include the following (this is not designed to be used as a checklist)

- Hunger
- Tiredness or listlessness
- Child dirty or unkempt
- Poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention seeking behaviour
- Untreated illnesses/injuries
- Pallid complexion
- Stealing or scavenging compulsively
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Neurotic behaviour

**Child sexual exploitation** is a form of sexual abuse where children are sexually exploited for money, power, sexual gratification or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation doesn't always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

**Indicators of Child sexual exploitation** may include the following (this is not designed to be used as a checklist)

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;

- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or don't take part in education

**Female genital mutilation (FGM)** includes procedures that intentionally alter or injure the female genital organs for non-medical reasons. It is a surprisingly common form of abuse in the UK.

"FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways". (Multiagency statutory guidance on female genital mutilation, April 2016).

The age at which FGM is carried out varies enormously according to the community. The procedure may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy. FGM is extremely harmful and has short and long term effects on physical and psychological health. FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries, including the UK. Oxbridge Guardians takes these concerns seriously and staff will be made aware of the possible signs and indicators that may alert them to the possibility of FGM.

There are a number of factors in addition to a girl's or woman's community or country of origin that could increase the risk that she will be subjected to FGM:

- The position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM.
- Any girl born to a woman who has been subjected to FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl who has a sister who has already undergone FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl withdrawn from Personal, Social and Health Education or Personal and Social Education may be at risk as a result of her parents wishing to keep her uninformed about her body and rights.

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, at marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

It is believed that FGM happens to British girls in the UK as well as overseas (often in the family's country of origin). Girls of school age who are subjected to FGM overseas are thought to be taken abroad at the start of the school holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies.

There can also be clearer signs when FGM is imminent:

- It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.
- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it.
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent.

- Parents seeking to withdraw their children from learning about FGM.

It is important that professionals look out for signs that FGM has already taken place so that:

- the girl or woman affected can be supported to deal with the consequences of FGM
- enquiries can be made about other female family members who may need to be safeguarded from harm.
- criminal investigations into the perpetrators, including those who carry out the procedure, can be considered to prosecute those breaking the law and to protect others from harm.

There are a number of indications that a girl or woman has already been subjected to FGM:

- A girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating. A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl or woman may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from school or college.
- A prolonged absence from school or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl or woman may be particularly reluctant to undergo normal medical examinations.
- A girl or woman may confide in a professional.
- A girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear.
- A girl may talk about pain or discomfort between her legs.

**The Mandatory Reporting Duty for FGM** states that from October 2015, Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Guardians and Homestays could be aware of this duty and whilst it would be rare for them to see visual evidence, and they should not be examining children or young people, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Under the mandatory reporting requirements teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out (either through disclosure by the victim or visual evidence) on a girl under 18. Those failing to report such cases would face disciplinary sanctions. Members of staff, volunteers and Homestays are asked to either report any FGM concerns immediately to the Designated Safeguarding Lead or if they feel more comfortable, directly to the local police. Where a referral is made directly to the police, the Designated Safeguarding Lead should also be informed as soon as possible.

**Radicalisation** is defined as the process by which people come to support terrorism and violent extremism and, in some cases, to then participate in terrorist groups. The process of radicalisation is different for every individual and is a process, not a one-off event; it can take place over an extended period or within a very short time frame. It is important that staff and volunteers are able to recognise possible signs and indicators of radicalisation.

Children and young people may be vulnerable to exposure or involvement with groups or individuals who advocate violence as a means to a political or ideological end. They can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These can include family members or friends, direct contact with members' groups and organisations or, increasingly, through the internet, including through social media sites. This can put children and young people at risk of being drawn into criminal activity and has the potential to cause significant harm.

**PREVENT** is part of the UK's counter terrorism strategy, it focuses on supporting and protecting vulnerable individuals who may be at risk of being exploited by radicalisers and subsequently drawn into terrorist related activity. PREVENT is not about race, religion or ethnicity, the programme is to prevent the exploitation of susceptible people. Schools and Homestays can play an important part in safeguarding children from the risk of radicalisation. Effective early help relies on all staff being vigilant and aware of the nature of the risk for children and young people, and what support may be available.

**Potential indicators of radicalisation** include:

- Use of inappropriate language
- Possession of violent extremist literature
- Changes in behavior, language, clothing or appearance
- The expression of extremist views
- Advocating violent actions and means
- Association with known extremists
- Seeking to recruit others to an extremist ideology

**If staff are concerned about a change in the behaviour of an individual or see something that concerns them** (this could be a colleague too) **they should seek advice appropriately with the Designated Safeguarding Lead.**

Non-urgent advice is available from the DfE on 020 7340 7264 or via e-mail at:

[counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

**Domestic Abuse** is defined as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse: Psychological, physical, sexual, financial and emotional.

Where there is Domestic Abuse in a family, the children/young people will always be affected; the longer the violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships.

This definition, which is not a legal definition, includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group.

Homestays and Schools are ideally placed to offer appropriate support, alongside other agencies, whether families are in crisis, or whether there are early signs of potential abuse.

Helplines:

<http://www.nationaldomesticviolencehelpline.org.uk>

Advice:

<http://www.nhs.uk/Livewell/abuse/Pages/domestic-violence-help.aspx>

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse>

**'Honour' based violence** encompasses crimes which have been committed to protect or defend the honour of the family and /or community, including Female Genital Mutilation, forced marriage and practices such as breast ironing. Oxbridge Guardians recognises that all cases of honour based violence fall under the safeguarding and child protection umbrella and will be treated accordingly.

**Peer on peer abuse** can manifest in many different ways, including on-line bullying, sexting, banter, initiation/hazing

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and inappropriate/harmful sexualised behaviours. In most instances, the conduct of children and young people towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Oxbridge Guardians recognise that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up'. The forms of peer on peer abuse are outlined below.

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- Harmful Sexual Behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others.
- Serious Youth Violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19 i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.

The term peer-on-peer abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences. There are also different gender issues that can be prevalent when dealing with peer on peer abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence).

Research indicates that young people rarely disclose peer on peer abuse and that if they do, it is likely to be to their friends. Therefore, we will also educate children and young people that we work with about how to support their friends if they are concerned about them, that they should talk to a trusted adult or someone at their school and what services they can contact for further advice.

Any concerns, disclosures or allegations of peer on peer abuse in any form should be referred to the Designated Safeguarding Lead. Where a concern regarding peer on peer abuse has been disclosed to the DSL, advice and guidance will be sought from Children Social Care and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted.

**Sexting** is the sending of an indecent image and can be illegal. Any indecent images shared of a person under 16 would be considered to be distributing an indecent image of a child. Oxbridge Guardians seeks to protect children from sexting and the significant impact it can have.

Advice for children and young people is available at:

<http://www.thinkuknow.co.uk>

<https://www.childline.org.uk/explore/onlinesafety/pages/sexting.aspx>

Advice for Homestays and parents is available at:

<http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting>

# Safeguarding Responsibilities

## All Staff, Volunteers and Homestays

All Oxbridge Guardians' staff, volunteers and Homestays 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.

All Oxbridge Guardians' staff, volunteers and Homestays must be aware of the information contained within the Safeguarding and Child Protection Policy and follow the given procedures.

All Oxbridge Guardians' staff, volunteers and Homestays are responsible for providing a safe environment for the children and young people in their care.

All Oxbridge Guardians' Homestays 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 Oxbridge Guardians Designated Safeguarding Lead as soon as is possible, and in all cases within 24 hours of a disclosure. Alternatively, Homestays may refer the matter directly to their Local Safeguarding Children Board (LSCB) and then inform the Oxbridge Guardians Designated Safeguarding Lead.

## Designated Safeguarding Lead

Oxbridge Guardians have appointed a Designated Safeguarding Lead (DSL) who is a senior manager within the company. The Designated Safeguarding Lead is Stephanie Gilbert and she can be contacted on +44 7837778298. Parents, Colleagues, Homestays, Volunteers and Schools are very welcome to contact Stephanie if they have any concerns about the welfare of a child or young person who is in the care of Oxbridge Guardians

The Designated Safeguarding Lead is responsible for:

- Being the first point of contact for Homestays, parents, guardians, children, young people, staff, volunteers and external agencies in all matters regarding Safeguarding and Child Protection.
- Maintaining a record of contacts (LADO, Children's Social Care (LSCB), MASH) in each of the Local Authority areas in which there are children or young people who are being cared for by Oxbridge Guardians.
- Referring a child or young person to the local Children's Social Care (LSCB), LADO and/or the police if there are concerns about possible abuse and acting as a focal point for those involved with the care of the child or young person 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 in which the child or young person is schooled can be found online).
- Keeping and regularly reviewing written records of concerns about a child or young person even if there is no need to make an immediate referral.
- Ensuring that all such records are kept confidentially and securely in accordance with the principles of Data Protection Act (2018) until the child's 25th birthday and are copied to the DSL in the child's or young person's school or college as appropriate under established information sharing protocols.
- Keeping parents and guardians appropriately informed of any action to be taken under these procedures in relation to their child in consultation with the school or college and their Designated Safeguarding Lead.
- Liaising with other agencies and professionals as appropriate.
- Ensuring that either they or another appropriate member of Oxbridge Guardians staff attends case conferences, core groups or other multi-agency planning meetings, contribute to assessments and provide a report which has been shared with the parents.
- Organising child protection induction, an annual refresher and formally updating training every 3 years for all Oxbridge Guardians' staff and Homestays and maintaining a record of such training. Initial training should be online, in the form of a formal course (Introduction to Safeguarding) with relevant follow up training and updates annually for host families and staff. For host families this would take the form of an email update from the Designated Safeguarding Lead, and for staff it would be in office training led by Designated Safeguarding Lead.

# Taking action when abuse or neglect is suspected or a complaint is made or concern raised

There are four key steps to follow to help you to identify and respond appropriately to possible abuse and/or neglect.

It may not always be appropriate to go through all four stages sequentially. If a child or young person is in immediate danger or is at risk of harm, you should immediately refer to children's social care and/or the police. Before doing so, you should try to establish the basic facts. However, it will be the role of social workers and the police to investigate cases and make a judgement on whether there should be a statutory intervention and/or a criminal investigation. You should record, in writing, all concerns and discussions about a child's or young person's welfare, the decisions made and the reasons for those decisions.

## Being alert to signs of abuse and neglect.

The first step is to be alert to the signs of abuse and neglect, to have read this document and to understand the procedures set out in it. If you have any questions at all you should discuss these with the Designated Safeguarding Lead.

## Questioning behaviours

The signs of child abuse might not always be obvious and a child or young person might not tell anyone what is happening to them. You should therefore question behaviours if something seems unusual and try to speak to the child or young person, if appropriate, to seek further information.

If a child or young person reports, following a conversation you have initiated or otherwise, that they are being abused and neglected, you should listen to them, take their allegation seriously, and reassure them that you will take action to keep them safe. You will need to decide the most appropriate action to take, depending on the circumstances of the case, the seriousness of the child's or young person's allegation.

You might refer directly to children's social care and/or the police, or discuss your concerns with others and ask for help. At all times, you should explain to the child the action that you are taking. It is important to maintain confidentiality, but you should not promise that you won't tell anyone, as you may need to do so in order to protect the child.

## Asking for help

Concerns about a child's or young person's welfare can vary greatly in terms of their nature and seriousness, how they have been identified and over what duration they have arisen. If you have concerns about a child or young person, you should always ask for help.

You should discuss your concerns with the Designated Safeguarding Lead or if they are not available another senior member of staff. The Designated Safeguarding Lead will usually decide whether to make a referral to children's social care.

You can also seek advice at any time from the NSPCC helpline – [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or 0808 800 5000. Next steps might involve undertaking an early help assessment or making a referral directly to children's social care/the police. If you have concerns about the safety or welfare of a child and feel they are not being acted upon by Designated Safeguarding Lead, it is your responsibility to take action.



### **Referring to children's social care.**

If, at any time, you believe that a child or young person may be a child or young person in need, or that a child or young person is being harmed or is likely to be, you would normally refer this to the Designated Safeguarding Lead but you can also refer immediately to local authority children's social care. This referral can be made by anyone. If you see further signs of potential abuse and neglect, report and refer again.

When referring a child or young person to children's social care, you should consider and include any information you have on the child's or young person's development needs and their parents'/carers' ability to respond to these needs within the context of their wider family and environment. If you chose to make a referral directly to children's social care, you should inform the Designated Safeguarding Lead as soon as possible.

### **Dealing with a disclosure of abuse**

When dealing with a disclosure, staff, volunteers and Homestays should remember that the priority is the child or young person. The matter should always be taken seriously. You should react calmly and try not to transmit any feelings of shock, anger or embarrassment. Please don't stop the child or young person who is freely recalling significant and often difficult events. Reassure the child or young person that you are pleased that they have decided to talk about this, however do not enter into any pact of secrecy or promise confidentiality at any stage. Assure them that you will try to help but be open in telling them that you will have to let other people know who are going to be better placed to offer advice, at this stage this will usually just be the DSL. You should explain who the DSL is and why they need to be informed. (Please note that passing information to a DSL / Children's Social Care / those responsible for protecting the welfare of children and young people is not a breach of confidentiality).

It is often a good idea to let the child or young person know that you believe them. Children very rarely lie about abuse; but they may have tried to tell others and not been heard or believed. You can also let them know that this is not their fault. You should encourage the child or young person to talk but do not ask them "leading questions" or press for information, you should listen carefully and seek to remember what they tell you. You should check that you have understood correctly what the child or young person is trying to tell you, but try to avoid asking them to recount painful information to you more than once.

Please do not tell the child or young person that what they have experienced is dirty, naughty or bad and whatever your personal feeling may be, it is never appropriate to make any comments about the alleged offender.

At the end of the conversation, tell the child or young person again who you are going to tell and why that person or those people need to know. As soon as you can afterwards, make a detailed hand-written record of the conversation using the child's own language. Include any questions you may have asked. Where possible, this should be recorded on the Cause for Concern Form which can be found in Appendix 1. Do not add any opinions or interpretations. This record should include the date, time and place of the conversation and should be signed by the person making it and should use names and not initials.

Once completed, the record must be kept securely and a copy handed to the Designated Safeguarding Lead as soon as possible. It is good practice to keep any original notes, however rough they may be. Please do not under any circumstances discuss the disclosure with any other adults or young people.

Once you have informed the Designated Safeguarding Officer, they will discuss with you any steps needed to be taken to protect the person who has disclosed and you may then be asked to go back to discuss this with the child or young person.

Please note that it is not the role of staff, volunteers or homestays to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk. Once the Designated Safeguarding Lead has been informed of the disclosure, the member of staff, volunteer or Homestay should continue to provide support to the child or young person and then carefully monitor the situation. They should pass on any further information or new concerns to the DSL but they should not seek to investigate the matter themselves as this may well prejudice the investigations of other agencies and ultimately cause further distress to the child or young person.

### **Dealing with concerns of neglect or abuse**

Staff, volunteers and Homestays who suspect abuse, notice signs of neglect or hear a complaint of abuse involving a student under the care of Oxbridge Guardians should immediately notify the Designated Safeguarding Lead or if they are not available another member of senior staff. They should then complete the Cause for Concern form which can be found at Appendix 1.

Once the Designated Safeguarding Lead has been informed of the concerns, the member of staff, volunteer or Homestay should continue to carefully monitor the situation and should pass on any further information or new concerns to the DSL but they should not seek to investigate the matter themselves as this may well prejudice the investigations of other agencies and ultimately cause further distress to the child or young person.

### **Action taken by the Designated Safeguarding Lead when abuse is suspected or a complaint is made**

The Designated Safeguarding Lead will take into account the inter-agency procedures of the Local Safeguarding Children Board where the child is based and the guidance given in *Working Together to Safeguard Children (2015)* and *Keeping Children Safe in Education (2016)*. They will consider the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to Children's Social Care (LSCB) or the police.

The Designated Safeguarding Lead will discuss the matter with the child or young person and will consider their wishes, provided that the child or young person is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that overrides the child or young person's wishes.

The Designated Safeguarding Lead may also discuss the matter with the parents of the child or young person, provided they have no interest which is in conflict with the child's best interests and that they are properly informed. Again, it may be necessary after all appropriate consultation, to override parental wishes in some circumstances. If the Designated Safeguarding Lead is concerned that disclosing information to parents would put a child at risk, they will take further advice from the relevant professionals before making a decision to disclose.

If the Designated Safeguarding Lead considers that it is likely that a child or young person has suffered significant harm, or that they may be at risk of significant harm a referral to Children's Social Care (LSCB) will be made without delay (and certainly within 24 hours). If there is room for doubt as to whether a referral to an external body should be made, the Designated Safeguarding Lead will consult with the Local Authority Designated Officer or Multi-Disciplinary Team on a no names basis without identifying the family.

Where the Designated Safeguarding Officer decides not to refer the concerns to the relevant authorities, the person who raised the concern will be given a clear written statement of the reasons why Oxbridge Guardians is

not taking action. The person will be advised that, if they remain concerned, they are free to consult with, or to report to, the relevant authorities. There will be no retribution or disciplinary action taken against a member of staff for making such a report, provided it is done in good faith.

If the initial referral is made by telephone, the Designated Safeguarding Lead will confirm the referral in writing to Children Social Care within 24 hours. If no response or acknowledgement is received within three working days the Designated Safeguarding Lead will contact Children Social Care again.

### **Allegations against Oxbridge Guardians Staff / Homestays**

It is vital that Oxbridge 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.

Oxbridge Guardians procedures for dealing with allegations against any Oxbridge Guardians staff volunteers and Homestays aim to balance the need to protect children and young people from abuse and the need to protect staff, volunteers and Homestays from false and unfounded allegations. Where appropriate, these procedures follow the guidance in the DfE guidance *Keeping children safe in education*, DfE, September 2016.

Any concern or allegation about a member of Oxbridge Guardians' Staff / Homestays must be reported to the Designated Safeguarding Lead immediately. If they are not available the matter can be passed to the Local Authority Designated Officer whose details can be found via your Local Safeguarding Children Board.

Suspension of staff or removing a child or young from a Homestay will not be an automatic response to an allegation. Full consideration will be given to all the options, subject to the need to ensure:

- the safety and welfare of the child(ren) or young person(s) concerned; and
- the need for a full and fair investigation.

All Oxbridge 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.

All Staff should be aware of and follow Oxbridge Guardians' policies on Staff Conduct.

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

### **Allegations about the Designated Safeguarding Lead (Whistleblowing)**

Should you have a concern about the conduct of the Designated Safeguarding Lead then you must refer this matter to Wandsworth Local Safeguarding Children Board and ask to speak to the Local Authority Designated Officer (LADO). The contact details for Wandsworth LSCB are as follows:

Duty Team, Referral and Assessment Service  
Children Social Care  
Department of Education and Children's Social Care (LSCB)  
2nd Floor Town Hall Extension  
Wandsworth High Street

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London  
SW18 2PU

Telephone: 020 8871 6622

Outside of normal office hours (after 5pm weekdays or on weekends): 020 8871 6000.

We hold contact details of each Local Safeguarding Children Board, for reporting purposes. The local board for you is **XXXXXXXXXXXXXXXXXX** and the details for the LSCB and Local Authority Designated Officer (LADO) is as below:

**XXXXXXXXXXXXXXXXXXXXXX**  
**XXXXXXXXXXXXXXXXXXXXXX**  
**XXXXXXXXXXXXXXXXXXXXXX**  
**XXXXXXXXXXXXXXXXXXXXXX**

**Allegations made to Police or Children's Social Care**

Oxbridge 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 Oxbridge Guardians' staff and/or on an Oxbridge Guardians' Homestay 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.

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

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 Oxbridge Guardians' Designated Safeguarding Lead and Directors should be involved in any ensuing activity and outcomes.

If a criminal offence has occurred then the LADO should immediately involve the police and decide whether or not an investigation is needed. Oxbridge Guardians' Designated Safeguarding Lead should be involved in any such discussion.

Oxbridge Guardians' DSLs will make a referral to the Disclosure and Barring Service if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned.

If a member of staff, volunteer or Homestay tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by Oxbridge Guardians Resignation will not prevent a prompt and detailed report being made to the Disclosure and Barring Service or other relevant body as determined by future legislation in appropriate circumstances.

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



### **Allegations made to School Staff**

A child or young person, or their parent(s), may make a disclosure about their Oxbridge Guardians Homestay 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 the Oxbridge Guardians' DSL to discuss these concerns.

The Oxbridge Guardians' DSL, on receiving such contact from a school should investigate the allegation as a matter of urgency and should also inform the child or young person's parents where appropriate.

During the time when investigations are being carried out, the member of Oxbridge Guardians staff or Homestay team concerned will be relieved of their guardianship or Homestay responsibilities and alternative arrangements will be made for the child or young person concerned.

### **Allegations against Children or Young People under the care of Oxbridge Guardians**

If a child or young person for whom Oxbridge Guardians have responsibility is accused of abuse against another child or young person for whom we have responsibility, we will take all appropriate action to ensure the safety and welfare of both children or young people, including the individual accused of abuse. This may include offering alternative accommodation for one or both children or young people.

If it is necessary for a child or young person to be interviewed by the police in relation to allegations of abuse, Oxbridge Guardians will ensure that, in consultation with the child or young person's school or college, parents or guardians are informed as soon as possible and that the child or young person is supported during the interview by an appropriate adult.

If the school or college decide that it is necessary to suspend the child or young person during the investigation, Oxbridge Guardians will provide appropriate support, assistance and accommodation.

These procedures will also apply as appropriate if a child or young person for whom we have responsibility is accused of abuse against any other individual for whom we do not have responsibility.

# Appendix 1

## Confidential Cause for Concern Form

Use this form to record any concern about a child or young person's welfare. Please do not interpret what you have seen or heard or attempt to investigate; simply record the facts. Please complete this form by hand. Once this form is completed it must be handed immediately to the Designated Safeguarding Lead. If they are not available please pass this form to another member of the Senior Staff for their attention.

Please remember to ask 'open' questions and not leading questions and allow time for the child or young person to tell you in their own words what has happened. Please try to listen as carefully as possible and keep an open mind.

Finally, please remember that you must never promise to keep any information a secret or to give an undertaking of confidentiality to the child or young person. You should explain that you will probably need to pass the information on to the Designated Safeguarding Lead who will ensure that any necessary action is taken but that you will be there to support the child or young person if they would like this.

Name of Child / Young Person \_\_\_\_\_

Date \_\_\_\_\_ Time \_\_\_\_\_

Location of observed behaviour / discussion/ disclosure \_\_\_\_\_

What are your concerns about this child / young person?

What have you observed and when?

What have you heard and when? (Record pupil's words verbatim if possible)

What have you been told and when?

I have discussed the issue of consent with \_\_\_\_\_ and they are aware that I will share this information with \_\_\_\_\_ and understands the reasons for this.

Have you spoken to the child or young person? YES / NO

What did they say? (Record their words verbatim if possible)

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Are the parents / guardians aware of this concern? YES / NO

Have you spoken to anyone else about your concern? YES / NO

Please list

Is this the first time that you have been concerned about this child / young person? YES / NO

Any further details

Name of member of adult completing this form \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_ Time \_\_\_\_\_

Passed to Designated Safeguarding Lead on \_\_\_\_\_(Date) at \_\_\_\_\_ (Time)

**For use by the Designated Safeguarding Lead**

Action Taken	By Whom	Outcome
Discussion with child		
Monitoring		
Check Pupil File		
Contact Parents		
Refer to Social Care		



## Appendix 2

### Sources of Further Information

Designated Safeguarding Lead – Stephanie Gilbert	+44 7837778298
Local Authority Designated Officer (LADO) <b>Wandsworth</b>	LADO@wandsworth.gov.uk 020 8871 7440
NSPCC	<a href="http://www.nspcc.org.uk">www.nspcc.org.uk</a>  0800 800 5000
Child exploitation and online protection centre (CEOP)	<a href="http://www.ceop.gov.uk">www.ceop.gov.uk</a>
For children and young people	Childline 0800 1111
NSPCC Share Aware Campaign (online safety)	<a href="http://www.nspcc.org.uk/shareaware">www.nspcc.org.uk/shareaware</a>
Child exploitation and online protection centre (CEOP)	<a href="http://www.thinkuknow.co.uk/">www.thinkuknow.co.uk/</a>
For parents	<a href="http://www.parentinfo.org/">www.parentinfo.org/</a>
For parents about online safety	<a href="http://www.childnet.com">www.childnet.com</a>
Office of the Children’s Commissioner	<a href="http://www.childrenscommissioner.gov.uk">www.childrenscommissioner.gov.uk</a>  020 7783 8330



## Appendix 3

### Communication with Oxbridge Guardians

**Office Opening Hours:** Monday to Friday 9:00am to 5:00pm  
*We are closed on weekends and bank holidays*

**Address:** Devas Club, 2a Stormont Road, Battersea SW11 5EN

Our office is based in a serviced office block in zone 2 of Central London. We are 3 minutes' walk away from Clapham Junction train station which is centrally located on the London rail network.

**Email Communication:** [info@oxbridgeguardians.co.uk](mailto:info@oxbridgeguardians.co.uk)  
[steph.gilbert@oxbridgeguardians.co.uk](mailto:steph.gilbert@oxbridgeguardians.co.uk)

During office hours urgent emails will receive immediate attention, and all emails will normally be dealt with on the day they are received. **Please note** that out of office hours, emails will only be read at peak times, such as the start of term. If something requires urgent attention please include 'urgent' in the subject of the email.

**Telephone:** +44 (0) 20 8432 3457

Calls are received directly to the office and answered by our staff. We do not operate an out of hours service, so please call back during office opening hours if we are closed

**Emergencies:** Director – Helen Wu  
From UK: 07515 494045 (English and Mandarin)  
International: + 44 7515 494 045 (English and Mandarin)

*Alternatively*

Designated Safeguarding Lead – Stephanie Gilbert  
From UK: 07837778298 (English only)  
International: + 44 7837778298 (English only)

The above numbers provide emergency telephone lines 24 hours per day, manned by our Director or alternatively our Designated Safeguarding Lead. These numbers will be forwarded to another member of staff if they are not available as part of our normal contingency planning. These telephones numbers **SHOULD NOT** be used for routine matters.