

C1.1 Bucksmore Homelingua Safeguarding and Child Protection Policy

C1.1.1 Terminology

OIEG is the Oxford International Education Group (referred to in this document as OIEG). Bucksmore Homelingua is a part of the Oxford International Education Group.

All adults working with children is the term used in this policy to describe all adults (everyone) who will come into contact with under 18's during our home tuition programmes. This list is not exhaustive but will include: teaching and activity staff, school directors and management staff, agents, hosts school staff, transport drivers, host families and group leaders, building cleaners and contractors.

Safeguarding and promoting the welfare of children is:

- 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.

Child Protection is a part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Duty of Care means that everyone is required to take reasonable care in any situation in which harm to someone else could be foreseen. **Higher Duty of Care** is the standard of care expected from someone with increased experience and specialist expertise where, through training or experience, one may be expected to visualise more clearly the results of one's actions in one's area/s of specialism. **Negligence Acts** or omissions by someone with a duty of care in which this is breached by falling below the standard of care required in the circumstances to protect others from the unreasonable risk of harm.

OIEG Designated Safeguarding Lead (ODSL) is the senior member of staff within OIEG who has key responsibility for raising awareness within the organisation of issues relating to the welfare of children and young people, and the promotion of a safe environment of the children and young people on Bucksmore Homelingua programmes. As a minimum, this person has completed Advanced Safeguarding Training for Designated Leads (previously referred to as level 3). The ODSL is supported by an **OIEG Deputy Designated Safeguarding Lead (ODDSL)**. The **Designated Person** is the person identified in the work situation who is usually the first point of contact for safeguarding concerns.

Bucksmore Homelingua Safeguarding Officer (BHSO) is the senior member of staff within Bucksmore Homelingua who has the responsibility for Child Protection in our home tuition courses and is accountable for the day to day matters, training and recording systems. As a minimum, this person has completed Advanced Level Safeguarding Training for Designated Staff (previously referred to as level 2). This person will have a named Deputy who will have completed Advanced Level Safeguarding Training for Designated Staff (previously referred to as level 2) as a minimum.

C1.1.2 Statement

OIEG is committed to the definition safeguarding and promoting the welfare of children. This policy is written with regard to the following documents:

- *'Keeping Children Safe in Education'* (July 2015)
- *'Working Together to Safeguard Children'* (March 2015)
- *'What to Do If You're Worried a Child Is Being Abused'* (2006)
- The Children Acts 1989 and 2004
- The Education Act 2002
- Counter Terrorism and Security Act 2015
- The Prevent Strategy (June 2015)

We believe that safeguarding is the individual and collective responsibility of everyone working in the company. Our policy recognises that the welfare and interests of children are paramount in all circumstances and is committed to ensuring its safeguarding practices exceed statutory requirements and the requirements of all our various accrediting bodies.

As Part of our safeguarding policy OIEG will:

- Promote and prioritise the safety and wellbeing of children and young people;
- Ensure all adults working with children understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people;
- Ensure children in our care, their parent/carers and overseas agents are aware of our safeguarding leads, this policy and safeguarding procedures as appropriate;
- Ensure appropriate action is taken in the event of incidents/concerns of abuse and support is provided to the individual/s who raise or disclose the concern;
- Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored;
- Prevent the employment/deployment of unsuitable individuals; and
- Ensure robust safeguarding arrangements and procedures are used effectively.

The policy and procedures will be widely promoted and are mandatory for everyone involved in OIEG. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

C.1.1.3 Entitlement

OIEG acknowledges that some children, including disabled children and young people or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take all reasonable and appropriate steps to ensure their welfare. The OIEG policy aims to ensure that regardless of age, gender, race, ethnicity, religion or beliefs, sexual orientation, socioeconomic background, all children:

- Have a positive and enjoyable experience on Bucksmore Homelingua home tuition courses in a safe and child-centred environment; and
- Are protected from abuse whilst participating in our Bucksmore Homelingua home tuition courses.

C.1.1.4 Adult Responsibilities

All adults present at the Bucksmore Homelingua teacher's house have a duty to:

- Understand, adopt, adhere to and implement the Safeguarding and Child Protections Policy;
- Respect and promote the rights, wishes and feelings of all students;
- Safeguard and promote the welfare of all students; and
- Conduct themselves in accordance with the Bucksmore Homelingua Code of Conduct.

C.1.1.5 Associated Policies

There are several policies associated with the Safeguarding and Child Protection Policy. These are listed below and will be made available to all adults working with children on Bucksmore Homelingua home tuition courses and are accessible on the Bucksmore Homelingua Teacher Portal website (<http://home-tutor.co.uk>)

- Health and Safety
- First Aid
- Fire Safety
- Risk Assessment
- IT and the Internet including social media, email and the use of photography.
- Student Code of Behaviour
- Staff Code of Conduct
- Safer Recruitment
- Tackling Extremism & Radicalisation
- Whistle-blowing
- e-Safety (local)
- Disciplinary Procedure

C1.1.6 Policy Review

When: The policy will be reviewed in March of each year and in light of new or updated guidance from the UK Government.

How: The OIEG Safeguarding Lead will monitor updates from the Department of Education and inform OIEG Senior Managers regarding best practice. Feedback is collected from students and staff and this will be collated, discussed and implemented.

By Whom: The OIEG Safeguarding Lead will be responsible for this process.

C1.1.7 Roles and responsibilities

OIEG meets its child protection responsibilities by ensuring that all staff are trained in Safeguarding, all senior staff have additional training qualifications and that all staff adhere to the Safeguarding and Child Protection Policy.

The OIEG Safeguarding Lead has completed training to a minimum of Advanced Safeguarding Training for Designated Leads (previously referred to as level 3) and the Bucksmore Homelinguia Safeguarding Officers has completed training of Advanced Level Safeguarding Training for Designated Staff (previously referred to as level 2). This training is regularly updated. Appropriate training will also be ensured for all roles related to recruitment and selection.

Training around policy will be delivered at the following levels:

By whom	To Whom	Where	When
ODSL, ODDSL or OSL	Home Teachers, Head Office Staff	Head Office	Ongoing
BHSO	Home Teachers	During teacher induction	As part of recruitment process
Home Teachers	Family member and U18's on home tuition courses	Family meeting and during student induction	On-boarding or with each newly arriving student

C1.1.8 Under 18's involvement

As part of 'Best Practice' all students will be made aware of the Child Protection and Safeguarding Policy and will be invited to make their own comments and contribution as appropriate during their induction.

C1.1.9 OIEG Code of Conduct

It is important that all adults working with children understand that the nature of their work and the responsibilities related to it, place them in a position of trust. At OIEG we aim to create a safe school culture by ensuring all adults working with children and young people follow a Code of Conduct. This Code of Conduct endeavours to:-

- assist staff working with children and young people to work safely and responsibly and to monitor their own standards and practice;
- set clear expectations of behaviour and codes of practice relevant to the role; and
- support employers in giving a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken;

The Key Elements of the Code of Conduct are as follows:

C1.1.10 Power and Positions of Trust

As a result of their knowledge, position and/or the authority invested in their role, all people working with children, young people are in positions of trust.

A relationship between a person and a child or young person cannot be a relationship between equals.

There is potential for exploitation and harm of vulnerable young people and adults. Where a person aged 18 or over is in a specified position of trust with a child under 18, it is a criminal offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.

This means that staff should not:

- use their position to gain access to information for their own or others' advantage;
- use their position to intimidate, bully, humiliate, threaten, coerce or undermine children and young people; or
- use their status and standing to form or promote relationships which are of a sexual nature, or which may become so.

C.1.1.11 Propriety and Behaviour

There may be times, for example, when a person's behaviour or actions in their personal life come under scrutiny from the work environment, the local communities or public authorities. This could be because their behaviour is considered to compromise their position in school or indicate an unsuitability to work with children, young people. Misuse of drugs, alcohol or acts of violence would be examples of such behaviour.

People in contact with children and young people should therefore understand and be aware, that safe practice also involves using judgement and integrity about behaviours in places other than the work setting.

This means that staff and home teachers should not:

- Not smoke or drink alcohol whilst in the company of, or whilst responsible for, students; and
- Behave in an aggressive, violent or forceful manner which would lend any reasonable person to question your suitability to work with children and young people or act as a role model.

C1.1.12 Infatuations

Occasionally, a child/young person may develop an infatuation with a staff member or home teacher. Staff or home teachers should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware, however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach. In this situation a staff member who becomes aware that a child or young person is developing an infatuation should discuss this at the earliest opportunity with a senior member of staff so appropriate action can be taken to avoid any hurt, distress or embarrassment.

This means that staff should not:

- Be in a one to one situation with the young person; or
- Encourage the obsession.

C1.1.13 Sexual Contact

Staff and home teachers should clearly understand the need to maintain appropriate boundaries in their contacts with children and young people. Intimate or sexual relationships between children/young people and the people who work with them will be regarded as a grave breach of trust. Allowing or encouraging a relationship to develop in a way which might lead to a sexual relationship is also unacceptable.

Any sexual activity between an adult and the child or young person with whom they work will be regarded as criminal offence and reported accordingly. Additionally, this will always be a matter for disciplinary action.

Children and young people are protected by specific legal provisions regardless of whether the child or young person consents or not. The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts. It may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material.

There are occasions when a person may embark on a course of behaviour known as 'grooming' where the sole purpose is to gain the trust of a child or adult at risk, and manipulate that relationship so sexual abuse can take place. Adults should be aware that consistently conferring inappropriate special attention and favour upon a child might be construed as being part of a 'grooming' process and as such will give rise to concerns about their behaviour.

This means that staff or home teachers should not:

- Have sexual relations with young people;
- Any communication which could be interpreted as sexually suggestive or provocative – either verbal, letter, notes, email, text, calls or contact;
- Talk about your own sexual relationships; or
- Make sexual remarks about the young person.

Relationships should be professional, healthy and respectful at all times. Your language, demeanour attitudes and conduct all require careful thought when dealing with children and young people.

C1.1.14 Dress and Appearance

Staff and home teachers should dress in ways which are appropriate to their role and this may need to be different to how they dress when not at work. People who work with children and young people should ensure they take care to ensure they are dressed appropriately for the tasks and the work they undertake.

Those who dress in a manner which could be considered as inappropriate could render themselves vulnerable to criticism or allegations.

Staff should wear clothing appropriate to the role:

- Not viewed as offensive, revealing or sexually provocative;
- Does not distract, cause embarrassment or give rise to misunderstanding;
- Is absent of any political or otherwise contentious slogan; and
- Is not considered discriminatory and is culturally sensitive.

C1.1.15 Behaviour Management

- All children and young people have a right to be treated with respect and dignity even in those circumstances where they display difficult or challenging behaviour;
- Staff should not use any form of degrading treatment to punish a child or adult at risk. The use of sarcasm, demeaning or insensitive comments towards children and young people is not acceptable in any situation. Any sanctions or rewards used should be part of a behaviour management policy which is widely publicised and regularly reviewed;
- The use of corporal punishment for children and young people is not acceptable; and
- Where a child may display difficult or challenging behaviour, a person must follow the behaviour policy outlined by their place of work, and use strategies appropriate to the circumstance and situation. The use of physical intervention can only be justified in exceptional circumstances and must be used as a last resort when other behaviour management strategies have failed.

C1.1.16 Physical Contact

There are occasions when it is entirely appropriate and proper for staff and home teachers to have physical contact with children, but it is crucial that they only do so in ways appropriate to their professional role. The general culture of 'limited touch' should be adapted and staff or home teachers should use their professional judgement at all times.

Physical contact should take place only when it is necessary in relation to a particular situation. Some of these situations are:

- During certain activities such as drama, sports and outdoor activities;
- When a child is in distress;
- Personal Care;
- For restraint and physical intervention; and
- Medical and First Aid.

This means that staff and home teachers should not:

- Use physical force as a means of punishment and discipline. The use of unwarranted physical force is likely to constitute a criminal offence;
- Never touch a child in a way which may be considered indecent; or
- Indulge in 'horse-play'.

C1.1.17 Communication with children and young people

Communication between children and young people by whatever method, should take place within clear and explicit professional boundaries. This includes the wider use of technology such as mobile phones text messaging, e-mails, digital cameras, videos, web-cams, websites and blogs. Staff should not share any personal information with a child or young person and should not use their personal mobile to communicate with any young person or on a personal level take photographs/videos. A person should ensure that all communications are transparent and open to scrutiny.

This means that staff should:

- Not give their personal contact details to children, young people, including their mobile or email;
- Inform the Centre Manager immediately if contacted by a young person on a personal mobile and only use equipment e.g. mobile phones, provided by organization;
- Only make contact with children for professional reasons and in accordance with any organisation policy;
- Recognise that text messaging is not an appropriate way to respond to a child;
- Not use internet or web-based communication channels to send personal messages to a child/young person; and
- Not use a social network site to complain or criticize colleague/school/child etc.

(See also Teacher Code of Conduct and E-safety policy)

C1.2 Child protection guidance

C1.2.1 How to respond to concerns

If you have concerns about a young person's safety or well-being, discuss your concerns with the Bucksmore Homelinguia Safeguarding Officer. If you still have concerns you and/or the Bucksmore Homelinguia Safeguarding Officer should contact the OIEG Safeguarding Lead (their name and contact details will be provided to you at the time of induction and their details can also be found on the OIEG website: www.oxfordinternational.com) who will have the appropriate training and expertise to support you and advise on the next stage. You should act swiftly. There should not be any time delay. If you cannot contact this person and you believe that a child may be in *imminent danger of abuse* you should contact the Police immediately.

C1.2.2 How to respond to a child disclosure

A concern may come to light as a response of something a child says to you. Often, this disclosure can be made during casual conversation. If a child makes a disclosure to you:

- Listen to the information and accept what you hear without passing judgement or dismissing what you hear. Do not dismiss or trivialise what the student has told you. Stay calm. Be aware of your own reactions. Do not transmit shock, anger or embarrassment;
- Never enter into a pact of secrecy with the child. Assure them you will try and help but this may involve telling a more senior trained member of staff. Do not promise confidentiality but that the information will be treated with great care but reiterate you may need to share the information with a trained safeguarding person;
- Reassure and praise the child. Tell them you believe them and it is not their fault. Children rarely lie about abuse but they may have tried to tell others and not been heard or believed;
- Encourage the child to talk without leading questions. Do not put words into the child's mouth or make judgemental statements about any person. Keep your own responses short and simple and do not offer new information. Do not interrogate the child. Check you have understood what the child is telling you. Do not comment of the offender – it may be someone they love;
- Be aware the child may retract what they have told you, but it is essential to report what you have heard;
- As soon as possible afterwards (if possible during the conversation) make a detailed record of the conversation, including questions you asked. Do not add your opinion;
- **Immediately** after the meeting you should contact the Designated Child Protection Officer and report the outcome of the meeting and produce the written record of the conversation;
- Take into account the child's age, their level of understanding, their culture and level of language;
- Confidentiality: you must never discuss issues with colleagues, family or friends. The information you have received must remain between yourself and the Designated Officer;
- Any information divulged must be on a need to know basis; and
- Parents/Carers (including Group Leaders) of the child will always be informed of allegations of abuse made by a child *unless this puts the child or the subsequent investigation at risk* (e.g. if they are the subject of the allegation).

C1.2.3 Recording Information and Record Keeping

Why?

- Clarifies the nature and extent of concerns
- Provides a clear record of development of concerns
- Identifies patterns of behaviour
- Assists any subsequent referrals
- Ensures consistency

What?

- Signs and Indicators
- Disclosures
- Relevant contact with parents and or other agencies

How?

- Factually - day, date, time place
- Give background information
- Record child's word verbatim
- Keep any initial notes
- Record action taken and the reasons

Secure provision is made for all records produced during any welfare discussions or disclosures at each individual centre. These records are then transferred to OIEG in Greenwich where they are held for three years. There are copies of all documents or information which may have been sent to any authority or agency.

C1.2.4 Recognising symptoms of abuse

Although a child may make a disclosure of abuse to you, it is entirely possible that you will become concerned about the welfare of a child because of their behaviour or because you notice physical symptoms of abuse.

The four areas of abuse are outlined briefly in the table below: A more comprehensive appendix will be presented in all staff training with additional guidance and scenarios used for discussion and developing further awareness and understanding.

There are no absolute criteria on which to rely when judging what constitutes as significant harm. Consideration of the severity of ill-treatment may include the degree and extent the duration and frequency of all the four abuses.

C1.2.5 What is abuse and neglect?

These are forms of maltreatment – a person may abuse or neglect a child by inflicting harm, or failing to act to prevent harm. Children and young people may be abused by a family member or in an institution or residential or community setting; by those known to them or, more rarely, by a stranger.

Type of abuse	Definition	Indicators
Physical	May involve hitting, shaking, throwing, squeezing, burning or scalding, poisoning, biting, drowning, suffocating or otherwise causing physical harm to a child.	There can be a lot of overlap between the signs and symptom of one type of abuse and another.
Emotional	Is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the emotional development of the child. It may involve conveying to children they are worthless, inadequate, unloved and threatening severe punishment, preventing the child from taking part in normal activities and/or abandonment. Also verbal abuse, taunting and shouting. It may take the form of text or cyberbullying.	Indicators of abuse could be:
Sexual	Young people are abused by adults, those in a position of trust, adolescents or other young people who use them to meet their own sexual needs. This involves sexual intercourse, attempted sexual intercourse, fondling, and any penetrative act (oral/anal) intercourse, masturbation and exposure to pornographic material. 'Grooming' a child in preparation for abuse, including via the internet, is a form of sexual abuse.	<ul style="list-style-type: none"> • Unexplained cuts, bruises, marks, abrasions, burns • Unwell • Distress • Self-harm or attempts at suicide • Withdrawn • Isolated • Aggressive • Overtly sexual behaviour • Unwashed • Bed-wetting • Clothes unchanged • Not taking part in activities • Not eating
Neglect	Is persistent failure to meet a child's basic physical and /or psychological needs. This can include not providing appropriate food, clothes, warmth and medical care or leaving a child unsupervised and failing to protect them from physical or emotional harm.	

C1.2.6 Handling allegations of abuse against staff or a home teacher

If an allegation is made against a member of staff or home teacher, the quick resolution of that allegation is our priority to the benefit of all concerned. At any stage of consideration or investigation, all unnecessary delays should be avoided.

- Any allegation of abuse by a member of staff should be reported to the Bucksmore Homelinguia Safeguarding Officer (or their named Deputy) straight away. In the absence of the Designated Person or their Deputy, or, in cases where the Designated Person or their Deputy are the subject of the allegation or concern, allegations should be reported to the OIEG Safeguarding Lead. In all cases, the OIEG Safeguarding Lead OIEG will be the Case Manager going forward.
- The OIEG Safeguarding Lead will then immediately contact their Local Safeguarding Children Board to discuss the case with the Local Authority Designated Person (LADO) and decide on strategy going forward. The OIEG Safeguarding Lead will then inform the accused person about the allegations as soon as possible after consulting the LADO.
- In response to an allegation staff suspension will not be the default option. An individual should only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification should be recorded by the school and the individual notified of the reasons.
- Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or malicious should not be referred to in employer references.

C1.2.7 Additional Guidance for all staff and home teachers:

Also, remember to protect yourself from false allegations of abuse. Try to ensure that one-to-one interviews are in rooms with glass doors, record and have countersigned all records of conversations and never offer students lifts in your own vehicles. We always aim to be friendly with students but that can mean that professional and private boundaries can get blurred. Be particularly careful about sharing jokes, use of inappropriate language use and physical contact.

Students that are found to have made malicious allegations are likely to have breached school behaviour policies. The school will therefore consider whether to apply an appropriate sanction, which could include permanent exclusion (as well as referral to the police if there are grounds for believing a criminal offence may have been committed).

C1.2.8 Handling allegations of abuse made against other students

Where the allegation of abuse is made by a child against a student who is an adult, again, suspension will not be the default option. The student should only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification should be recorded by the school and the individual notified of the reasons.

At this stage, Agents or Parents may only be informed that the student has been suspended with the permission of the student. If the student briefs the agent themselves and the agent seeks clarification from us then appropriate details may be provided at this time.

Allegations that are found to have been malicious will be removed from all school records and will not be referred to in reference requests from external agencies.

'Abuse is not just an adult phenomenon' and it is not something that is necessarily committed only by an adult. Children can pose a threat to other children, either physical or sexual; and abuse may be committed

Where we have reason to suspect that a child may be suffering, or is likely to suffer, significant harm as a result of the actions of another child (or children), the response will be considered in the light of all the relevant facts and circumstances. The Bucksmore Homelinguia Safeguarding Officer and/or the OIEG Safeguarding Lead will discuss the circumstances and relevant senior pastoral colleagues will be involved as appropriate. Additionally, the advice of the LADO will be sought at a very early stage. Any disclosure, allegation or concern will be referred in the usual way to the LADO.

In the event of any disclosure about student on student abuse, all the children involved, whether alleged perpetrator or victim, must be treated as being 'at risk' and this needs to inform the school's handling of the situation.

C1.2.9 Procedures for handling a student disclosure

Bucksmore Homelinguia is committed to ensuring that it meets its responsibilities in respect of child protection by treating any allegation seriously and sensitively.

Receive

- Carefully listen to what the student is saying and remain calm.
- Accept what is said. The child making the disclosure may be known to you as someone who does not always tell the truth. However do not let your past knowledge of this person allow you to pre-judge or invalidate their allegation.
- Do not attempt to investigate the allegation. Your duty will be to listen to what is being said and to pass that information on.

Reassure

- Reassure the student that they have done the right thing by telling you.
- Do not promise confidentiality. You will be under a duty to pass the information on and the student needs to know this.
- Reassure the student that the people who will be informed will be sensitive to their needs and will be looking to help protect them. Inform them that it is not in their interests to keep the disclosure confidential and it will have to be passed on to the appropriate agencies.

React

- You can ask questions and may need to in certain instances. However this is not an opportunity to interrogate the student and go into the territory of in depth and prolonged questioning. You only need to know the salient points of the allegation that the student is making. Any questions must be open and not leading.
- Do not criticise the perpetrator as the student may still have a positive emotional attachment to this person.
- Do not ask the student to repeat their allegation to another member of the family or staff. If they are asked to repeat it they may feel that they are not being believed and / or their recollection of what happened may change.

Record

- Take notes as soon as it is practical to do so. Record the actual words spoken by the child – do not re-translate them into the way that adults speak or try to make sense of the structure of what was said). Do not be offended by any offensive language or words used to describe the abuse).
- Time and date your notes and do not destroy them in case they are required by a court.
- If you are able to do so then draw a diagram to indicate the position of any bruising but do not ask the child to remove any clothing for this purpose.
- Record statements and observable things, rather than your interpretations' or assumptions.

Final step

- Once you have followed the above guidelines, pass the information on immediately to the Bucksmore Homelinguia Safeguarding Officer, or the Deputy Bucksmore Homelinguia Safeguarding Officer, who will report this information to an appropriate agency (the Local Authority Designated Officer - LADO).
- The person to whom the disclosure was made should ensure that the child who has disclosed the information is informed about what will happen next, so they can be reassured about what to expect.
- You can report your concerns directly to the local LADO if you are not satisfied with the response from Bucksmore Homelinguia or Oxford International Education Group. The contact information can be found on your Local Council website.

C1.2.10 Suspicion of abuse or inappropriate behaviour by a member of staff, home teacher, home teacher family member, student or supplier

If it comes to your attention that the following has occurred:

- Behaved in a way that has harmed or may have harmed a student
- Possibly committed a criminal offence against or related to a student
- Behaved inappropriately towards a student, or behaved in other ways that suggests they may be unsuitable to work with children
- Behaved towards a student or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.

The following procedures must be followed:

- Record your concerns and report them to the Bucksmore Homelinguia Safeguarding Officer
- The Bucksmore Homelinguia Safeguarding Officer will take measures to ensure that particular person is not left in sole charge of any child
- The Bucksmore Homelinguia Safeguarding Officer will contact the Local Authority Designated Officer (LADO) to ask for advice and how to proceed and to give details of the concern
- Bucksmore Homelinguia will then follow the LADO's advice on how to deal with allegations
- Although support will be offered to the member of staff, home teacher, home teacher family member, student or supplier involved, Bucksmore Homelinguia will ensure that the agencies concerned are given all assistance in conducting investigations

C1.2.11 Help for members of staff, home teachers, home teacher family members, students or suppliers

Bucksmore Homelinguia is committed to fully support all members of staff, home teachers, home teacher family members, students or suppliers with our policies and procedures. The Bucksmore Homelinguia Safeguarding Officer and Oxford International Education Group Designated Lead can be contacted or if preferred the following agencies National Association for the Prevention of Cruelty to Children telephone: 0800 800 500 or Childline telephone: 0800 1111

C1.2.12 Obligation to report

Bucksmore Homelinguia must report all details to the Disclosure and Barring Service (DBS) when an alleged members of staff or home teacher has resigned or they have been dismissed because they have harmed or may harm children or vulnerable adults. The must be referred to the DBS as soon as it becomes known.

C1.2.13 Child Protection, Safeguarding and Prevent monitoring and implementation

Bucksmore Homelinguia will have a designated member of staff with the responsibility for child protection, safeguarding and prevent issues.

The designated member of staff will receive reports from members of staff, home teachers, home teacher family members, students or suppliers where there are concerns about child protection, safeguarding or prevent issues. These reports will be securely stored by the designated member of staff for 5 years. Only the designated member of staff and the Managing Director will have access to these records.

C1.2.14 Contact procedure

You should call the Bucksmore Homelinguia Safeguarding Officer / Child Protection Officer first to report an issue. If you think a child is in immediate danger contact the police by calling **999**. If there is no immediate danger you can call **101** (UK) and ask for the Safeguarding Coordination Unit.

C1.3 Other safeguarding issues

Safeguarding covers a range of issues. We should do everything possible to ensure that students feel safe at all times.

C1.3.1 Bullying

All students should have an opportunity to discuss bullying: its causes, student strategies to deal with it and the OIEG's policy on it. Increasingly bullying is about cyber-bullying and there is information available to help tackle this.

If you do become aware of a case of bullying, inform the Designated Person or their Deputy, or, in cases where the Designated Person or their Deputy are not available, to the OIEG Designated Safeguarding Lead.

Ideally we will use 'Restorative Justice' as a way of dealing with bullying rather than traditional Disciplinary methods available. Restorative Justice dispenses with the notion of victims and perpetrators and focuses on solutions to the problem based on mutual understanding and shared perceptions.

If Restorative Justice fails we will refer to the Bucksmore Homelinguas's Anti-Bullying Policy. However, it is worth pointing out that it is not possible to exclude a student permanently without clear evidence that bullying has taken place.

C1.3.2 Female genital mutilation (FGM)

Female genital mutilation 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 – over 1700 victims were referred to specialist clinics in the UK during the last 2 years. Many more cases are believed to go unreported.

OIEG 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.

A girl or woman who's had FGM may:

- Have difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Have unusual behaviour after an absence from school or college
- Be particularly reluctant to undergo normal medical examinations
- Ask for help, but may not be explicit about the problem due to embarrassment or fear

Any indication that FGM is a risk, is imminent, or has already taken place should be reported to the Designated Person or their Deputy, or, in cases where the Designated Person or their Deputy are not available, to the OIEG Designated Safeguarding Lead.

C1.3.3 Child sexual exploitation

(CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. However, victims often carry two phones or one phone and two SIM cards.

If you suspect a child is at risk of CSE or that this has already taken place this should be reported to the Designated Person or their Deputy, or, in cases where the Designated Person or their Deputy are not available, to the OIEG Safeguarding Lead.

C1.3.4 e-Safety

New technologies have become integral to the lives of children and young people and adults in today's society, both within schools and in their lives outside school.

The use of these exciting and innovative tools in school and at home has been shown to raise educational standards and promote pupil / student achievement. However, the use of these new technologies can put young people at risk.

Each setting within the OIEG group have a specific e-safety policy that should be read in conjunction with this Safeguarding Policy.

C1.3.5 Extremism & Radicalisation

The Counter-Terrorism and Security Act places a duty on services providers to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

Radicalisation is a form of abuse and is responded to from within our Safeguarding procedures. As a group of companies, OIEG values:

- Democracy;
- The rule of law;
- Individual liberty;
- Mutual respect and tolerance of different faiths and beliefs.

All OIEG staff and home teachers receive training to both support their awareness of the Prevent Strategy and their ability to identify and support individuals who are vulnerable to being drawn into terrorism. All OIEG settings will co-operate fully their Local Authority 'Channel Panel' in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate.

C1.3.6 Accommodation

- All host accommodation for young people and vulnerable adults will be checked to ensure that all host families, landlords, landladies and all other residents staying in the home are suitable to house our students. In addition, we conduct a DBS check on all tutors who work with juniors.
- Bucksmore Homelingua will ensure that appropriate procedures and monitoring are in place for all host accommodation.
- Bucksmore Homelingua will provide guidelines to tutors outlining the requirements for hosting juniors. These include guidelines on safety, illness, free time and using the internet. Please see Teacher's Manual.

C1.4 Welfare rules for young learners

When booking young learners on courses with Bucksmore Homelingua it is important that agents, parents, tutors and students are aware of and agree to the following stipulations, which are in the interest of safeguarding the student:

C1.4.1 Welfare rules for students aged 9 and under

- Are not allowed out of the home alone and are completely cocooned by the teacher and host family, for which an additional supplement is charged
- If not attending a course (i.e. travelling with a parent on a course as an accompanying person), Homelingua require that independent childcare be arranged for the child
- If the parent is accompanying the child on a course, the parent is responsible for the child outside of lesson hours

C1.4.2 Welfare rules for students aged 10 - 15

- Are required to be accompanied at all times, but may have supervised independent time in the teacher's home

C1.4.3 Welfare rules for students aged 16 - 17

- May have controlled independent time only in the local area if they have a full orientation beforehand and must observe a 17.30 curfew
- May use public transport by themselves if agreed by the parent/guardian. However Bucksmore Homelingua may not allow this if we have concerns over safety
- May only be left alone in the teacher's home if at all, for short periods of time (to collect children from school for example) and only if the teacher is satisfied that the student is comfortable with being left home alone
- Although allowed limited independence, are often as vulnerable as students under 16. Bucksmore Homelingua and our teachers reserve the right to assess the risk to the student in relation to activities/excursions and independent time and refuse a student's request even if approved by his parent/guardian in the interests of safeguarding

C1.4.4 Welfare rules for all young learners

- Must provide a contact email address (or that of a parent/guardian) so that the Homelingua teacher can establish contact in advance of arrival
- Are advised to bring their Parental Consent Form signed, which Homelingua will provide
- Where the request or activity is not covered by Bucksmore Homelingua policies, the teacher must seek written parental permission for the request. The Academic Teacher Manager must be copied into all correspondence
- Final discretion regarding student welfare is with the teacher

C1.5 Excursions and activities policy

Bucksmore Homelingua will provide guidance to teachers about providing a suitable leisure programme for students, including offering students a range of activities or trips in the local area (and any costs involved) for them to choose what they want to do. Some of these activities and trips should be free of charge.

When visiting local amenities or taking part in out-of-lesson activities with the teacher

- Risk assessments are completed for visiting local amenities or tourist attractions as part of teacher diligence.
- Students are provided with a contact telephone number for the teacher in case of loss or separation, and both tutor and student should have the correct contact details for Homelingua (the head office number or the emergency out-of-hours contact number) should any issues arise.
- Teachers will take particular care when supervising students in the less formal atmosphere of an activity or excursion. When outside of the home, ensure the age guidelines about independent time are adhered to. Tutors will ensure students under the age of 16 are not left unsupervised (without written permission from parents/Homelingua to state otherwise). Students aged 16-17 may have controlled independent time if the teacher /parents deem this to be appropriate.
- Rarely, activities or excursions may include overnight stays. Teachers must inform Bucksmore Homelingua of any such proposals and careful consideration needs to be given to sleeping arrangements. Students, Bucksmore Homelingua head office staff, parents and agents (if applicable) should be informed of these prior to the start of the trip.

C1.6 Transfer policy

When providing a transfer service for a Bucksmore Homelingua student under the age of 18, drivers must agree to take responsibility for the safety and well-being of that student from the time of collection to hand-over to the teacher or airport services. This responsibility lies both with the company and the driver as an individual.

C1.6.1 Guidelines for students 15 and under

The assisted check in service is offered to students of any age but is required by Homelingua for students age 15 and under and from 2014 has been included in our course fees.

- If the student is departing from London St Pancras and travelling on Eurostar, the driver needs to park up and take the student to the ticket gates
- For drop-offs at all other airports, Bucksmore Homelingua will book this service with the transfer company. The driver will take the student to check-in, wait with them in the queue and ensure they are handed over to the airline staff if travelling as unaccompanied minors or taken to the security checkpoint if not travelling as an unaccompanied minor. Until hand-over takes place the driver is responsible for the student.
- Unaccompanied Minor Service may, or may not be booked by the agent/parent.
- Bucksmore Homelingua sales team will get clear information from the agent as to whether a UM service is booked or not booked, and will inform the Homelingua airport rep/driver.

C1.6.2 Guidelines for students 16 -17

- Driver assistance to Terminal. This service is for students aged 16 -17 and included in the course fee. The driver must park up, take the student to the terminal and show them the correct check in area.
- The driver should never drop and go with a young learner and should only leave the student when he/she is satisfied that they are safe and confident in making their way independently.

C1.6.3 Independent transfers policy

Students under the age of 16 must travel to / from the teacher's house by car taxi transfer service from a licenced operator or be accompanied by a parent / guardian. Students under the age of 16 are not permitted to / from travel to the teacher's house on their own. Bucksmore

Students aged 16-17, with parental permission, are allowed to take public transport to / from the teacher's house.

C1.6.3 Supplier and driver criteria

- Bucksmore Homelingua provides a managed car transfer service with one of our carefully selected car transfer companies. Drivers must have a valid PCO licence or Irish equivalent, which includes a DBS / Criminal background check.
- Drivers must wear smart attire and the vehicle be in good condition and road-worthy
- Drivers must speak clearly and slowly and be mindful that English is not the student's first language

- Drivers must hold a sign board with the student's name and Bucksmore Homelingua clearly written
- If the driver is having any difficulties locating the student on arrival, they must contact the student or the Bucksmore Homelingua emergency number +44 7773389143
- Drivers must not leave the teacher's house until the passenger, regardless of age, has met the teacher
- Drivers are obliged to follow Bucksmore Homelingua and Oxford International Education Group's Safeguarding policy and Tackling Extremism and Radicalisation Policy. They must report any concerns to the Bucksmore Homelingua Safeguarding Officer

C1.5 Designated Contact Person for Safeguarding and Child Protection issues

The role of the Designated Person is to take lead responsibility for managing child protection issues and cases. This involves providing advice and support to other staff, making referrals to and liaising with the local authority and working with other agencies.

Within Bucksmore Homelinguia, the Academic Teacher Manager will take the lead on child protection issues and cases. He has completed training of Advanced Level Safeguarding Training for Designated Staff (previously referred to as level 2). This training is regularly updated. All staff members at the Bucksmore Homelinguia head office have completed the Introduction to Safeguarding Children Training Course (formerly referred to as Level 1 Safeguarding) and Bucksmore Homelinguia Course Consultants have completed Advanced Level Safeguarding Training for Designated Staff (previously referred to as level 2). Staff involved in recruitment of home tuition teachers have completed Safer Recruitment training and Risk Assessment training.

To report an issue, contact the Bucksmore Homelinguia Safeguarding Officer. If the issue is related to the Bucksmore Homelinguia Safeguarding Officer, contact the Bucksmore or OIEG Designated Safeguarding Lead (ODSL), see next page. If you are not satisfied with the response from either the Bucksmore Homelinguia Safeguarding Officers or the Bucksmore / OIEG Designated Safeguarding Leads, contact your Local Authority Designated Person (LADO) for Safeguarding.

If there is immediate danger, contact the emergency services on 999.

Bucksmore Homelinguia Safeguarding / Child Protection Officer

Name: David Goodier

Email: academic@homelinguia.com

Telephone: +44 208 312 8075 (Office hours)

Telephone: +44 777 3389143 (24/7)

Deputy Bucksmore Homelinguia Safeguarding Officer

Name: Julian Keith

Email: julian@homelinguia.com

Telephone: +44 208 312 8075 (Office hours)

Telephone: +44 777 3389143 (24/7)

Bucksmore (BDSL) / OIEG Designated Safeguarding Lead (ODSL) and the OIEG Deputy Designated Safeguarding Lead (ODDSL) can also be contacted if the issue or case relates to one of the Bucksmore Homelinguia Safeguarding Officers or if you are not satisfied with the response from the Bucksmore Homelinguia Safeguarding Officers. They are also the Child Protection Officers for Bucksmore Homelinguia. The Bucksmore Homelinguia Safeguarding Officers will also liaise with the OIEG ODSL and ODDSL when reports are made.

Bucksmore Designated Safeguarding Lead (BDSL)

Name: Peter Grieve

Email: peter@bucksmore.com

Telephone: +44 20 3128060 (Office hours)

Telephone: +44 777 3389143 (24/7)

OIEG Designated Safeguarding Lead (ODSL)

Name: David Wilkins

Email: dwilkins@oxfordinternational.com

Telephone: +44 20 8293 1188 (Office hours)

Telephone: +44 7501935809 (24/7)

OIEG Deputy Designated Safeguarding Lead (ODDSL)

Name: Nikole Roimpa

Email: safe@oxfordinternational.com

Telephone: +44 208 312 8075 (Office hours)

Telephone: +44 7501935809 (24/7)