

Care of under 18s at CIE Oxford

Policy

July 2019

Reviewed: February 2021

Introduction and Context

A key principle to effective safeguarding of all pupils is that safeguarding is everybody's responsibility. This guidance aims to help all staff working at CIE Oxford, where foreign students under the age of 18 are registered. The guidance builds on the expectations of the guidance outlined below and tries to make clear what the expectation on professionals and establishments alike should be.

From the outset we need to be clear that while this is guidance, there is a very clear expectation that the responsibilities outlined are followed in all cases except where there is a clear justifiable reason not to do so.

CIE Oxford and its staff (including Host families) will do as much as possible to keep children and young people safe. The needs of the child are paramount and procedures that are in place should relate to all aspects of the child's life whether that applies to the school setting, the social enrichment programme or the place the child is living.

CIE Oxford accepts responsibility for ensuring that the various aspects of this guidance are both in place and monitored regularly.

Should you require any further advice or guidance in how to carry out the expectations of this document please feel free to contact either:

Designated Safeguarding Lead, Irma Banyte-Kelly
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Email: dos@cie-oxford.com

or the Deputy Designated Safeguarding Lead, Claire Neatham
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Child Protection/Safeguarding

1 Introduction

1.1 This policy has been developed in accordance with the principles established by the Children Act 1989 as well as drawn from the expectations laid out in Working Together to Safeguard Children 2013, the UK Council for International Student Affairs Guidance "International students under 18: guidance and good practice" and Safeguarding Children and Safer Recruitment in Education 2007.

1.2 The management at CIE takes seriously its responsibility under section 11 of the Children Act and duties under "working together" to safeguard and promote the welfare of children; to work together with other agencies to ensure adequate arrangements exist within our setting to identify, and support those children who are suffering harm or are likely to suffer harm. We recognise that all staff have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern. Our school should provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child free from discrimination or bullying where children can learn and develop happily.

1.3 The aims of this policy, which applies to all staff and volunteers working at CIE, are:

1.3.1 To support the child's development in ways that will foster security, confidence and resilience.

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

1.3.3 To raise the awareness with all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.

1.3.4 To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we contribute to assessments of need and support plans for those children where appropriate.

1.3.5 To acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding children and young people.

1.3.6 To develop a structured procedure within the school which will be followed by all members of the staff in cases of suspected abuse.

1.3.7 To develop effective working relationships with all other agencies, involved in safeguarding children.

1.3.8 To ensure that all adults within our school who have access to children have been checked as to their suitability. This includes other community users of our facilities, following correct staff recruitment and selection procedures

2 Procedures

The definition of a 'minor' in the United Kingdom a person who is 18 or under. However, in your pre-arrival communication with us, you will note that we will ask for different permissions for different ages 18 and under, for example we would allow a 15 year old to travel to and from school alone (if their parents sign a consent form) but someone 14 years old and/or under would need to be signed in and out of the school by a recognised adult on a daily basis.

2.1 CIE's procedures for safeguarding children will be in line with Oxford Local Education Authority and Oxfordshire Safeguarding Children Board Child Protection Procedures, and "Working Together to Safeguard Children 2015". The Designated Safeguarding lead (DSL), the Co-Principal, Irma Banyte-Kelly, and the Deputy DSL, Activities Manager, Claire Neatham, will ensure that:

2.1.1 The Senior Staff understands and fulfils its safeguarding responsibilities.

2.1.2 We have Designated Members of staff who have undertaken appropriate training for the role, as recommended by the LA, within the last two years. Our designated staff will update their training with LA/OSCB

approved training every two years. Our Designated staff members are: Irma Banyte-Kelly (DSL) and Claire Neatham (Deputy DSL).

2.1.3 All adults, (including volunteers) new to the school will be made aware of this policy and the procedures for child protection, the name and contact details of the Designated person and have these explained as part of their induction into the school.

2.1.4 All members of staff are provided with opportunities at least every three years to receive training in order to develop their understanding of the signs and indicators of abuse, how to respond to a pupil who discloses abuse and the procedure to be followed in appropriately sharing a concern of possible abuse or a disclosure of abuse.

2.1.5 Host families are aware of and understand the need for compliance with CIE's child protection guidelines and procedures

2.1.6 The name of any member of staff considered not suitable to work with children will be notified to the DBS (Disclosure and Barring Service) with the advice and support of the Oxfordshire County Designated Officer (LADO).

3 Definition of abuse

3.1 Although the definition of child abuse detailed below is considered unlikely to apply to the children in our care/ care of host families, we should remember that language schools have occasionally been targeted by paedophiles posing as EFL teachers (and, in some cases holding genuine qualifications). Such individuals are able to gain the confidence of vulnerable children (i.e. children away from home in a foreign country), with a view to abusing them.

3.2 Four categories of abuse are recognised in legislation:

- physical abuse
- neglect
- emotional abuse
- sexual abuse

3.3 The NSPCC defines child abuse as:

"Child abuse is the term used when an adult harms a child or a young person under the age of 18.....Child abuse can take four forms, all of which can cause long term damage to a child: physical abuse, emotional abuse, neglect and child sexual abuse. Bullying (including cyber-bullying) and domestic violence are also forms of child abuse.

4 Symptoms of Abuse

4.1 The NSPCC lists some of the signs and behaviours which may indicate that a child is being abused:

- repeated minor injuries
- children who are dirty, smelly, poorly clothed or who appear underfed
- children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of 'detachment' or 'don't care' attitude
- overly compliant behaviour
- a 'watchful attitude'
- sexually explicit behaviour (e.g. playing games and showing awareness which is inappropriate for the child's age), continual open masturbation, aggressive and inappropriate sex play
- a child who is reluctant to go home, or is kept away from school for no apparent reason
- does not trust adults, particularly those who are close
- 'tummy pains' with no medical reason
- eating problems, including over-eating, loss of appetite
- disturbed sleep, nightmares, bed wetting
- running away from home, suicide attempts
- self-inflicted wounds
- reverting to younger behaviour

- depression, withdrawal
- relationships between child and adults which are secretive and exclude others
- pregnancy.

4.2 These signs are not evidence themselves; but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

5 Child sexual exploitation (CSE)

5.1 The sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people, (or a third person or persons) receive something, (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) as a result of them performing and/or others performing on them, sexual activities.

5.2 Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources.

5.3 Violence, coercion and intimidations are common, involvement in exploitative relationships being characterised in the main by the child's or young person's limited availability of choice, resulting from their social/economic and/or emotional vulnerability. (DCSF 2009)

5.4 Sexual exploitation often starts around the age of 10 years old. Girls are usually targeted from age 10 and boys from age 8.

5.5 It affects both girls and boys and can happen in all communities.

5.6 Any person can be targeted but there are some particularly vulnerable groups: Looked After Children, Children Leaving Care, Children with Disabilities and children in an isolated situation, away from peers and family, and when there is regular contact.

5.7 Victims of CSE may also be trafficked (locally, nationally and internationally).

5.8 Over 70% of adults involved in prostitution were sexually exploited as children or teenagers.

5.9 Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16. That is approximately 2 million children.

5.10 Good practice – Individuals

- Recognise the symptoms and distinguish them from other forms of abuse
- Treat the child/young person as a victim of abuse
- Understand the perspective / behaviour of the child/young person and be patient with them.
- Help the child/young person to recognise that they are being exploited
- Collate as much information as possible
- Share information with other agencies and seek advice / refer to Social Care

5.11 Good practice – Organisations

- Ensure robust safeguarding policies and procedures are in place which cover CSE
- Promote and engage in effective multi-agency working to prevent abuse
- Work to help victims move out of exploitation
- Cooperate to enable successful investigations and prosecutions of perpetrators

[Link to guidance](#)

6 Forced marriages (FM)

6.1 A FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014.

6.2 A FM is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

6.3 FM is illegal in England and Wales. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)

[Link to the guidance](#)

7 Female Genital Mutilation (FGM)

7.1 FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures.

7.2 FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

7.3 Other than in the excepted circumstances, it is an offence for any person (regardless of their nationality or residence status) to:

- perform FGM in England, Wales or Northern Ireland (section 1 of the Act);
- assist a girl to carry out FGM on herself in England, Wales or Northern Ireland (section 2 of the Act); and
- Assist (from England, Wales or Northern Ireland) a non-UK person to carry out FGM outside the UK on a UK national or permanent UK resident (section 3 of the Act).

[Link to the guidance](#)

8 Supporting Staff

8.1 We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

8.2 We will support such staff by providing an opportunity to talk through their anxieties with the Designated Person and to seek further support. This could be provided by another trusted colleague, Occupational Health, and/or a representative of a professional body or trade union, as appropriate.

8.3 We recognise that our Designated Person(s) should have access to support and appropriate workshops, courses or meetings as organised by the LA.

8.4 In consultation with all staff, we have adopted a code of conduct for staff at our setting. This forms part of staff induction and is in the staff handbook and in our 'care of under 18s' guide. We understand that staff should have access to advice on the boundaries of appropriate behaviour (below).

9 Guidance for Safe Working Practice of Children and Staff in Education

9.1 The majority of adults who work with children seek to provide a safe and supportive environment, which secures the well-being and very best outcomes for children and young people in their care. It is recognised that achieving these aims is not always straightforward. Much relies on pupil and staff interaction where tensions and misunderstandings can occur. It is here that staff behaviours can give rise to allegations being made against them. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

9.2 Staff should avoid any conduct which would lead any reasonable person to question their motivation and intentions.

9.3 A relationship between a member of staff and a child or young person cannot be a relationship between equals. All staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

- 9.4 All staff are expected to treat information they receive about children and young people in a discreet manner.
- 9.5 Staff should not make sexual remarks to a student or engage in sexual activities with a student.
- 9.6 Staff should not discuss their own sexual relationships, with, or in the presence of, students.
- 9.7 Staff should not discuss a student's sexual relationships in inappropriate settings or contexts.
- 9.8 Staff should report any behaviour by colleagues that raises concern.
- 9.9 Staff should not establish or seek to establish social contact with young students for the purpose of securing a friendship or to pursue or strengthen a relationship.
- 9.10 Staff should be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described. Where possible, a gap or barrier should be maintained between teacher and child at all times.
- 9.11 Staff should never indulge in horseplay, tickling or fun fights.
- 9.12 Staff should never give their personal emails to students or befriend students through social media (social media contact with students is inappropriate)
- 9.13 Staff should not under any circumstances take photos of students using any device other than CIE's camera or Ipad.
- 9.14 Staff should consider the way they offer comfort to a distressed child.
- 9.15 Staff may legitimately intervene to prevent a student from committing a criminal offence, injuring themselves or others or causing damage to property. In these cases any physical contact should be the minimum required for restraint. All incidents of the use of physical restraint should be recorded in writing and reported immediately to Irma. See "Classroom expectations and behaviour".
- 9.16 Under no circumstances should physical force be used as a form of punishment.
- 9.17 Staff should ensure that there is visual access and/or an open door in one to one situations.
- 9.18 The curriculum can sometimes lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Staff must ensure that such discussion is neither inappropriate nor offensive.

10 Child Protection: Anti-Bullying (and Cyber-Bullying)

Bullying is understood to be behaviour which makes others feel uncomfortable or threatened, whether intended or not.

There are different forms of bullying:

- PHYSICAL BULLYING – e.g. hitting, kicking.
- DAMAGING PROPERTY
- NON PHYSICAL BULLYING - e.g. teasing, insulting gestures
- EMOTIONAL BULLYING – e.g. taunting, spreading rumours, cyber-bullying

It can be hard for adults, including parents, to know whether or not a child is being bullied as you can't always see the signs of bullying. And no one sign indicates for certain that a child's being bullied. But you should look out for:

- belongings getting "lost" or damaged
- physical injuries such as unexplained bruises
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- not doing as well at school
- asking for, or stealing, money (to give to a bully)
- being nervous, losing confidence, or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.

10.1 All staff and pupils at CIE are encouraged to establish and maintain happy and harmonious relationships to ensure that students can thrive without fear.

10.2 Students are encouraged to seek help whenever it is needed, whether it be for themselves or for others, and they are reminded that help can be sought from many different people.

10.3 Concerns about bullying should be raised in the first instance with a person who may be able to help, for example a teacher, the Accommodation Officer or Activities Assistant. After discussion the matter will be investigated with the other person(s) concerned, and appropriate action taken.

10.4 A full factual record will be taken and the member of staff will monitor the situation.

10.5 One of the co-principals will be informed immediately, and the parents will be contacted if appropriate.

10.6 Students should be aware that although the matter will be discussed in confidence, information may sometimes need to be forwarded and further help sought.

11 Child Protection: Student Complaints

11.1 The Children Act 1989 is a detailed and important piece of legislation concerned with (i) children and (ii) the people who have care of children and responsibility for them, including parents, guardians/carers/host families, activities leaders, teachers, doctors, nurses, police officers, social workers and others.

11.2 Central to the Children Act is the intention to make the care of every child in the country as sound and secure as possible. As a result of the Act, people who work professionally with children must aim to work effectively with colleagues in their own organisations and with colleagues from other organisations; and all adults who have responsibility for children, professionally or otherwise, must ensure that they carry out their responsibilities wisely, sensitively, honestly and fairly.

11.3 At CIE we support students in the following ways:

- Provision of a caring and friendly environment where students feel free to discuss their problems.
- Regular meetings between student and tutor.
- Notes in the Students Handbook which outlines the complaints procedure.
- Immediate response to problems raised by agents, teachers and others.

12 If a child reports abuse

12.1 Children who have a problem may speak to someone whom they trust. It is important that the member of staff sets the boundaries firmly at the outset of such a conversation, making it clear that no one can offer absolute confidentiality. A young student who is insistent upon confidentiality should be referred to an external source, such as ChildLine. If the student is only prepared to speak if absolute confidentiality is guaranteed, the member of staff should terminate the conversation at that point. The adult should provide the DSL with a written account of what has transpired as a matter of urgency.

12.2 If a student decides to speak to a member of staff about the fact that either he/she, or a student known to them, is being bullied, harassed and abused, the member of staff should:

- React professionally, and remember that they are not carrying out an investigation, (which is a task for specialists).
- Take what the child says seriously, and calmly, without becoming emotionally involved.
- Make it clear why unconditional confidentiality cannot be offered. Explain that any adult member of staff is obliged to inform Irma, if child protection or safeguarding issues are involved, in order that specialist help can be arranged.
- Encourage the student to speak directly to either Claire or Irma.
- Explain that only those who have a professional “need to know” will be told, and, if appropriate, measures will be set up to protect the student from retaliation and further abuse.
- Reassure the student that he or she was right to tell, and that he/she is not to blame for having being bullied or abused.
- Allow the child to tell his or her own story, without asking detailed or leading questions.
- Record what has been said.
- Inform Irma or Claire as soon as possible – at least by the end of the morning/afternoon session of that day.
- Inform Irma or Claire immediately in cases where abuse from a member of staff is alleged, or if the incident happened inside the school, or on a school trip.

13 Action to protect the student

13.1 Information about possible abuse may come to a member of staff in several ways – direct allegation from a child that has been abused, through a friend, relative or other child, through a child’s behaviour or through observation of an injury to the child.

13.2 In the case of an allegation being made by the child concerned or by a third party it is important to remember that:

13.2.1 Defendants have been acquitted where leading questioning or inappropriate investigation has been proven.

13.2.2 It is vital that subsequent enquiries should not be prejudiced by detailed questioning in school.

13.3 A referral, either in writing, or in written confirmation of a telephone call, will always be made to the local Social Services Department to carry out an investigation within 24 hours of an allegation or suspicion of abuse have arisen . Irma or Claire will consider how best to support and monitor the pupil concerned through the process of investigation, liaising closely with parents, the Local Safeguarding Children Board (LSCB), or other agencies involved to identify the support strategies that will be appropriate.

14 Allegations against staff

14.1 All staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

14.2 We understand that a child or young person may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform Irma, Claire or the most senior member of staff available.

14.3 Irma on all such occasions will discuss the content of the allegation with the LADO (Local Authority Designated Officer) before taking any action. In our county contact should be made with Alison Beasley LADO (01865 815956) or Sandra Pasquet, Assistant Designated Officer (01865 323457)

14.4 If the allegation made to a member of staff concerns Irma, the person receiving the allegation will immediately inform Claire or John, who will consult with the LADO, without notifying the manager first.

14.5 The school will follow the procedures for managing allegations against staff, as outlined in keeping children safe in education 2015.

14.6 Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult with the LADO

14.7 Our lettings agreement for other users requires that the organiser will follow LA procedures for managing allegations against staff and, where necessary, the suspension of adults from premises.

15 Whistle-Blowing

If a teacher or member of staff has concerns about the behaviour of another member of staff towards a pupil, he or she should report it at once to either Irma or Claire. Any concern will be thoroughly investigated under the school's whistle-blowing procedures. If there is evidence of criminal activity, the Police will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in good faith needs to fear retribution.

16 Confidentiality

A member of staff who uses the whistle-blowing procedure is entitled to have his/her name protected from being disclosed by Claire or Irma to the alleged perpetrator, without his/her prior approval. However, it has to be recognised that his/her evidence may be required by the Police to be used in any criminal proceedings.

17 Where a member of staff has concerns about a student

If a teacher or other member of staff has concerns about any pupil or incident that touches upon child protection issues, he or she should report them as soon as possible to Claire or Irma.

18 Disclosure and Barring Service (DBS)

18.1 All new Staff whether Admin, Teachers, Activities Leaders or Carer/s (host parent/s) are required to sign a declaration regarding their suitability to work with children and to agree to a DBS check if they cannot provide a current DBS disclosure. All of our host families are required to provide DBS disclosures, if hosting children under 18. Fostering arrangements with the Social Services department must be provided for children staying with a host family for more than twenty-eight days. In exceptional cases where an employee is needed at short notice but does not have an active DBS check, CIE will immediately begin the safeguarding process of obtaining a DBS (through Swiftcheck this is usually done in 3 days). Additionally, before the employee begins work, CIE will also complete a Risk Assessment which will address issues such as supervision.

18.2 Your appointment is subject to the receipt of a Disclosure Certificate from the DBS which does not disclose any matter not voluntarily disclosed to CIE before or at interview or prior or during your appointment. In the event of the Disclosure Certificate revealing any such matter you shall be liable to a review of the Disclosure in the context of the school's Policy on the Recruitment of Ex-Offenders, and subject to an unsatisfactory review, you will be liable to summary dismissal.

18.3 As an organisation using the DBS Disclosure service to help assess the suitability of applicants for positions of trust, CIE complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information.

18.4 The full policy is available in the Employment Law folder kept in the staff room.

19 The Recruitment of Ex-Offenders

19.1 As an organisation using the DBS Disclosure service to assess an applicant's suitability for positions of trust, CIE complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed.

19.2 CIE is committed to a fair treatment of its staff, potential staff, or users of its services, regardless of gender, race, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

19.3 We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.

19.4 A Disclosure will be requested for every employee at CIE.

19.5 As the position for which applicants will be applying is exempt from the terms of the 1974 Rehabilitation of Offenders Act, CIE is allowed to ask questions about candidates' entire criminal record for the purpose of assessing the applicant's suitability for the position.

19.6 We encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. We request that this information be sent under separate, confidential cover, to the designated person(s) within CIE and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process.

19.7 At interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment. In the event that employment has commenced then the person may be dismissed if it becomes clear that they have withheld information.

19.8 We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment or before taking a decision to dismiss.

20 Prevent

20.1 CIE will have regard to our obligations to prevent students from being drawn into extremism or terrorism or terrorism. We recognise that this is our statutory duty under The Counter Terrorism and Security Act 2015. We shall do this by:

- teaching students in a way that is consistent with our laws and values.
- equipping young people with the knowledge, skills and understanding to think for themselves, to challenge and debate.
- providing a safe environment for discussing controversial issues and helping young people to understand how they can influence others.
- providing our staff with the training so that they can handle these issues sensitively yet confidently.

[Link to our full Prevent policy](#)

21 Host Families/Carers

For many students the highlight of their stay in Oxford is their host family. To continue to ensure this, and in addition to the host family guidance and Code of Conduct, the following considerations should also be taken by our families as a matter of course:

21.1 Medical Emergencies: Host Parents will contact Julie or the CIE emergency number if the child in their care is taken to hospital or has any medical emergency.

21.2 Ages: If children need to share accommodation then where possible children under the age of 16 should be placed in homes with other children under 16 and 16-18 year olds should be placed together (ie not with under 16s). Where children are of mixed ages Enhanced DBS checks will need to be completed on all occupants over the age of 18.

21.3 Sharing of bedrooms: Carer's own children will not be sharing accommodation with an international student. Children who are enrolled on a course that lasts for more than 2 months should not share a bedroom. The only exception to this is children who are same sex siblings and they are permitted to share a bedroom for longer periods if specifically requested by the child's parents. However, wherever possible, parents should be given the option to place siblings within the same household in separate rooms to give them the best possible environment for completing their studies. It is never acceptable for a child to share a bedroom with an unrelated adult.

21.4 Curfews: Minors are expected to go straight home after school unless they have made an alternative

arrangement with you with the conditions that: a) they tell you **who** they will be with and b) **where** they will be. They must be home by the recommended curfew (or earlier if you prefer). CIE guidelines should be reinforced to young students regarding freedom, meeting with friends, travelling on public transport, return times and so on. Any parental restrictions and/or those imposed by CIE must be observed.

22 E-safeguarding

CIE Oxford and its staff (including Host families) will do as much as possible to keep children and young people safe. The needs of the child are paramount and procedures that are in place should relate to all aspects of the child's life whether that applies to the school setting, the social enrichment programme or the place the child is living. CIE Oxford accepts responsibility for ensuring that the various aspects of this guidance are both in place and monitored regularly.

22.1 Aims

- to protect all children and young people attending CIE Oxford and who make use of technology (such as mobiles phones, computers, laptops and the internet) whilst they're within the care of CIE Oxford
- to provide staff with policy and procedure information regarding e-safety
- to ensure CIE Oxford is operating in line with their values and within the law regarding how the organisation uses information technology.

22.2 We believe that

- children and young people should never experience abuse of any kind
- children should be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe at all times.

[Link to our full E-safeguarding policy](#)

Agent(s) /Parent(s): Care of under 18s

CIE Oxford's recruitment, induction and monitoring practices.

Recruitment:

- CIE will send new agents the care of Under 18s policy.
- New Agent applicants will be required to send two references.

Induction:

- Upon completion of the checking of references, an 'Agent's Agreement' outlining T&Cs (as well as signing that the care policy has been read) will be signed between agent and CIE.
- A copy of the enrolment form will also be sent with the remaining expected permissions and consent form questions.

Monitoring:

- Feedback is collected through monitoring processes (CIE Online or hard copies of feedback forms or indeed, in person) and conveyed to the agent. Any necessary actions will be dealt with by Irma Banyte-Kelly.

Agents duty of care:

- To provide honest, comprehensive information to prospective clients in their own language
- To be a de facto guardian in the absence of a local guardian
- To act as translator in communications with parents

In cases of problems, complaints or allegations made against Agents :

- Problems or Complaints will be brought to the attention of Irma Banyte-Kelly who will take the appropriate action.

Visitor(s): Care of under 18s

Visitors:

- Will sign in at reception
- Will be given a name Badge with CIE logo to be worn on site
- Will be accompanied (when/ if appropriate)

Contractors (in addition to the above):

- will be subjected to a pre-agreement Risk Assessment (including asking for documentation satisfying our requirements for working in an environment where minors are present)

In cases of problems, complaints or allegations made against Visitors or contractors :

- Problems or Complaints will be brought to the attention of Irma Banyte-Kelly who will take the appropriate action.
- Allegations will be brought to the DSL or Deputy DSL as a matter of urgency and actions taken thereafter will be in accordance with the information outlined in the Child Protection Policies above (see 11 & 13)

Host Families/Carer(s): Care of under 18s

CIE Oxford's recruitment, induction and monitoring practices.

Recruitment:

- New Host Families/ Carer(s) will be expected to:
 - complete a host family agreement 'code of conduct' form, agree to DBS checks and sign a declaration of accuracy
 - read the CIE host family/carer(s) recruitment policy which includes CIE's statement on child protection and expectations of a Host family/Carer.

Induction:

- Upon successful recruitment new Host Family/Carer(s) will:
 - receive a face-to-face induction (including a signature confirming their familiarity with the 'Care of Under 18s' Policy)
 - complete online safeguarding courses (below)
 - provide necessary documents and information to complete DBS check
 - be made aware of their duties to welcome and induct new students to the family ('Host Family Guidelines' document).

Monitoring:

- Students can, and are encouraged to, feedback and/or report any issues at any time through CIE Online or in person - Julie will respond accordingly to any issues.
- The 'Care of Under 18s' Policy, including whistleblowing, encourages the culture of care.
- Online safeguarding courses and DBS checks are refreshed in line with guidelines above.
- Host families/Carer(s) will be reviewed every 2 years, including a visit to the house and a meeting with the main carer(s).

Host family(s) / Carer(s) duty of care:

- Carer(s) are expected to be fully inducted on CIE's 'care of under 18s' Policy (with signatures collated)
- In addition carer(s) are expected to take basic training in:
 - Generalist Safeguarding Training through the Oxfordshire Safeguarding Children's Board (OSCB) website <http://training.oscb.org.uk/elearning-list>
 - PREVENT through the Home Office <https://www.elearning.prevent.homeoffice.gov.uk/>
- Carer(s) will inform Julie King, the CIE Accommodation Manager, if, after reading CIE's policy and completing the training, they are in any way concerned about the welfare of the child in their care. Julie will then refer the issue to the DSL or Deputy DSL who will take the matter further, if appropriate to do so.
- All staff (including de facto staff like Carer(s) understand that safeguarding is everybody's responsibility.
- The culture of care nurtured at CIE means no one who reports a genuine concern needs fear retribution (re. whistleblowing policy).
- All staff are aware of allegation procedures (outlined in the policy above).

In cases of problems, complaints or allegations made against a Carer:

- Problems or Complaints will be brought to the attention of Julie King who will take the appropriate action
- Allegations will be brought to DSL or Deputy DSL.
- As a matter of urgency and actions taken thereafter will be in accordance with the information outlined in the Child Protection Policies above (see 11 & 13).

Activity Leader(s): Care of under 18s

CIE Oxford's recruitment, induction and monitoring practices.

Recruitment:

- New Activity Leader applicants will be expected to:
 - complete an application form including details of two referees, explain any gaps in CV, agree to DBS checks and sign a declaration of accuracy (prior to interview)
 - read the CIE recruitment policy which includes CIE's statement on child protection and the letter sent to referees (prior to interview)
 - answer questions about the above (during 'panel' interview)

Induction:

- Upon successful recruitment new Activity Leaders will:
 - receive a face-to-face induction (including a signature confirming their familiarity with the Under 18s Policy)
 - complete online safeguarding courses (below)
 - be made aware of who the DSL and Deputy DSL are
 - provide necessary documents and information to complete DBS check
 - be made aware of their duties to protect and nurture students in their care at all times

Monitoring:

- Students can, and are encouraged to, feedback and/or report any issues at any time through CIE Online (if over 15) or in person (everyone).
- The 'care of under 18s' Policy, including whistleblowing, encourages the culture of care.
- Online safeguarding courses and DBS checks are refreshed in line with guidelines above.

Activity Leader(s) duty of care:

- Activity Leader(s) are expected to be fully inducted on CIE's 'care of under 18s' Policy.
- In addition to DBS and reference checks AL(s) are expected to take basic training in:
 - Generalist Safeguarding Training through the Oxfordshire Safeguarding Childrens Board (OSCB) website <http://training.oscb.org.uk/elearning-list>
 - PREVENT through the Home Office <https://www.elearning.prevent.homeoffice.gov.uk/>
- If, after reading CIE's policy and completing the training, ALs are in any way concerned about the welfare of any child at CIE they will inform the DSL or Deputy DSL.
- ALs will take a register at the start of each activity and ensure the safe return of all students to CIE.
- All staff understand that safeguarding is everybody's responsibility.
- The culture of care nurtured at CIE means no one who reports a genuine concern needs fear retribution (re. whistleblowing policy).
- All staff are aware of allegation procedures (outlined in the policy above).

In cases of problems, complaints or allegations made against an Activity Leader:

- Complaints will be brought to the attention of the DSL or Deputy DSL who will take the appropriate action.
- Allegations will be brought to the attention of the DSL or Deputy DSL as a matter of urgency and actions taken thereafter will be in accordance with the information outlined in the Child Protection Policies above (see 11 & 13).

Teacher(s): Care of under 18s

CIE Oxford's recruitment, induction and monitoring practices.

Recruitment:

- New teacher applicants will be expected to:
 - complete an application form including details of two referees, explain any gaps in CV, agree to DBS checks and sign a declaration of accuracy (prior to interview)
 - read the CIE recruitment policy which includes CIE's statement on child protection and the letter sent to referees (prior to interview)
 - answer questions about the above (during 'panel' interview)

Induction:

- Upon successful recruitment new teachers will:
 - receive a face-to-face induction (including a signature confirming their familiarity with the Under 18s Policy)
 - complete online safeguarding courses (below)
 - be made aware of who the DSL and Deputy DSL are
 - provide necessary documents and information to complete DBS check
 - be made aware of their duties to induct new students, when necessary

Monitoring:

- Students can, and are encouraged to, feedback and/or report any issues at any time in person.
- The 'care of under 18s' Policy, including whistleblowing, encourages the culture of care.
- The DoS will look in on classes within 10 minutes of commencement to check the registers/absences.
- Online safeguarding courses and DBS checks are refreshed in line with guidelines above.

Teacher(s) duty of care:

- Teachers are expected to be fully inducted on CIE's 'care of under 18s' Policy.
- Teachers will take the register before each class, take the register with them in fire drills and inform DoS of absences.
- In addition to DBS and reference checks, teacher(s) are expected to take basic training in:
 - Child Protection Training through the SSS CPD website <https://training.ssscpd.co.uk/>
 - PREVENT through the Home Office <https://www.elearning.prevent.homeoffice.gov.uk/>
- If, after reading CIE's policy and completing the training, teachers are in any way concerned about the welfare of any child at CIE they will inform the DSL or Deputy DSL.
- All staff understand that safeguarding is everybody's responsibility.
- The culture of care nurtured at CIE means no one who reports a genuine concern needs fear retribution (re. whistleblowing policy).
- All staff are aware of allegation procedures (outlined in the policy above).

In cases of complaints or allegations made against a teacher:

- Complaints will be brought to the attention of the DSL or Deputy DSL who will take the appropriate action.
- Allegations will be brought to the attention of the DSL or Deputy DSL as a matter of urgency and actions taken thereafter will be in accordance with the information outlined in the Child Protection Policies above (see 11 & 13).

Group Leader(s) from abroad: Care of under 18s

CIE Oxford's recruitment, induction and monitoring practices.

Recruitment:

- Accompanying Group Leaders (GLs) will (prior to arrival):
 - be sent the Pre-arrival information (explain to student in mother tongue)
 - acknowledge receipt of an agreement describing their rights and obligations while accompanying students to CIE Oxford
 - receive a formal mail requesting police checks are done prior to arrival
 - assist students/families with consent and permissions forms
 - acknowledge receipt of the 'Care of under 18s' Policy.

Induction:

- Upon arrival with group at CIE Oxford, Group Leaders will:
 - attend and assist (with translation, as a minimum) a face-to-face induction
 - sign to confirm their familiarity with the Under 18s Policy
 - complete online safeguarding courses (below)
 - be made aware of who the DSL and Deputy DSL are
 - provide original Police checks from their country of origin
 - be made aware of their duties to induct new students, as and when necessary.

Monitoring:

- Students can, and are encouraged to, feedback and/or report any issues at any time in person.
- The 'care of under 18s' Policy, including whistleblowing, encourages the culture of care.
- Online safeguarding courses and DBS checks are refreshed in line with guidelines above.

Group Leader(s) duty of care:

- GL(s) are expected to be fully inducted on CIE's 'care of under 18s Policy.
- In addition GL(s) are expected to take basic training in:
 - Generalist Safeguarding Training through the Oxfordshire Safeguarding Childrens Board (OSCB) website <http://training.oscb.org.uk/elearning-list>
 - PREVENT through the Home Office <https://www.elearning.prevent.homeoffice.gov.uk/>
- If, after reading CIE's policy and completing the training, GLs are in any way concerned about the welfare of any child at CIE they will inform the DSL or Deputy DSL.
- All staff (including de facto staff like GLs) understand that safeguarding is everybody's responsibility.
- The culture of care nurtured at CIE means no one who reports a genuine concern needs fear retribution (re. whistleblowing policy).
- All staff are aware of allegation procedures (outlined in the policy above).

In cases of problems, complaints or allegations made against a Group leader/s:

- Complaints will be brought to the attention of the DSL or Deputy DSL who will take the appropriate action.
- Allegations will be brought to the DSL or Deputy DSL as a matter of urgency and actions taken thereafter will be in accordance with the information outlined in the Child Protection Policies above (see 11 & 13).