



WOLSEY HALL OXFORD
THE HOMESCHOOLING COLLEGE

Safeguarding Policy January 2022

Date of Policy: 22 January 2022
Review Timetable: Annually
Next Review Date: 22 January 2023
Designated Safeguarding Lead: Dejeniera Pygott
Deputy Safeguarding Lead: Sarah Webb

Table of Contents

Contents

1. Introduction and Purpose
2. Roles and Responsibility
3. Referrals
4. Record Keeping, Confidentiality and Information Sharing
5. Working with other Agencies
6. Recognising Abuse
7. Working with Parents
8. Safer Recruitment
9. Online Safety
10. Other Information

Table of Appendices

1. Appendix 1: Procedures to follow in cases of possible, alleged or suspected abuse
2. Appendix 2: Signs and Indicators
3. Appendix 3: Process for dealing with allegations against staff and volunteers
4. Appendix 4: Female genital mutilation
5. Appendix 5: Violent extremism and radicalisation
6. Appendix 6: The Seven Golden Rules to Sharing Information
7. Appendix 7: Childcare Disqualification Regulations
8. Appendix 8: Useful Links and Information

1. Introduction and Purpose

- 1.1 As an online provider of home education which is accessible from around the world, Wolsey Hall Oxford is committed to ensuring safeguarding and safe working practice is at the heart of what we do. Wolsey Hall aims to provide a high quality and safe learning experience. The college is committed to responding appropriately to any concerns of abuse or neglect.
- 1.2 Safeguarding and promoting the welfare of children is defined as “Protecting children from maltreatment; preventing impairment of children’s mental and physical 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” (“Keeping Children Safe in Education” 2020).
- 1.3 Students with Wolsey Hall include children, and adults – some of whom may have care and support needs. In line with current UK legislation and guidance, we aim to ensure that our learners are safeguarded from harm.
- 1.4 All children have an absolute right to a childhood which is free from abuse, neglect and exploitation. The welfare and protection of the students we work with is of paramount consideration.
- 1.5 This policy and the procedures contained within it, alongside the Safer Recruitment Policy, are not designed to discourage adults from working with Wolsey Hall Oxford, but to ensure, as far as possible that people who may abuse children do not get the opportunity to do so.
- 1.6 ‘Staff’ refers to anyone engaged in work on behalf of Wolsey Hall Oxford, whether paid or unpaid.
- 1.7 ‘Parents’ refers to anyone who has legal responsibility for the care of a student.
- 1.9 ‘Students’ refer to anyone who is enrolled on a course at Wolsey Hall.
- 1.10 This policy reflects the statutory guidance, Working Together to Safeguard Children 2018 (Updated 2020) and Keeping Children Safe in Education (2019).

2. Roles and Responsibilities

- 2.1 All adults involved in Wolsey Hall Oxford’s activities and who come into contact with children have a duty of care to safeguard and promote their welfare.
- 2.2 Wolsey Hall Oxford will ensure that all adults who work with or on behalf of our

students are competent, confident and safe to do so.

2.3 Adults working for the college are responsible for their own actions and behaviour. They should avoid any conduct that would lead a reasonable person to question their motivation or intention.

2.4 Everyone involved in Wolsey Hall Oxford's activities must follow our Code of Conduct.

2.5 They must also be familiar with the steps to be taken in the event of becoming aware of, suspecting, or receiving allegations of abuse or neglect.

2.6 All staff are required to undertake safeguarding training at least every 3 years. This consists of a course on Canvas created at Level 1.

2.7 The Safeguarding Lead/s, Principal and Director of Studies will work together to ensure this policy and procedures are adhered to.

2.8 Wolsey Hall Oxford has a lead safeguarding officer to:

- Offer support and guidance to students, families, and all staff involved in the college's work
- Ensure that all Wolsey Hall Oxford staff are sufficiently vetted
- Act as the main point of contact in the event of any allegation or disclosure
- Providing best practice guidance
- Act as the main point of contact between Wolsey Hall Oxford and partner schools for safeguarding matters
- Ensure that appropriate action is taken should a concern arise
- Reviewing this policy and best practice in line with UK statutory requirements and recommendations to reduce safeguarding risks within the organisation.

2.9 In the event of an allegation, concerns of a safeguarding nature, or where a member of staff fails to comply with any element of the Code of Conduct, this information must be passed immediately to Wolsey Hall Oxford's Lead Safeguarding Officer/s. In consultation with the Principal and Director of Studies, it is the Lead Safeguarding Officer's responsibility to collect all relevant information and make decisions on how to proceed. In the absence of the Lead Safeguarding Officer, the Deputy Safeguarding Officer will undertake this role.

3. Referrals

3.1 In the first instance, safeguarding referrals should be made to a member of the school's safeguarding team. Should members of the safeguarding team be unavailable contact the Principal or Director of Studies.

3.2 In the event that a young person discloses abuse to a member of Wolsey Hall Oxford staff, they must follow the procedures outlined in Appendix 1.

3.3 Referrals can be made to the MASH Team (Multi Agency Safeguarding Hub) - to report a concern for a student's welfare, or for advice about how to make an appropriate referral. Every local authority has a MASH team and it would be wise to consult the agency relevant to the student.

3.4 Safeguarding Lead Procedures

- A log will be created when a concern is raised using an online form. An overview chronology, which will hold a record of all communications, concerns and actions, is then started. Such historic files will be stored securely.
- Where there is just one concern the situation is monitored and such records are kept also on the log, which is reviewed regularly by the DSL, DDSL and other relevant staff (to ensure no further concerns come to our attention).
- Where initial enquiries do not justify a referral to the investigating agencies, we will inform the initiating adult and monitor the situation. If in doubt, we will seek advice from the MASH or international safeguarding organisation where the student is resident.
- All contact related to the concern will be recorded. We will share information confidentially with those who need to know, observing the guidelines as laid out in "Information Sharing" 2018.
- Where there is a Child Protection concern requiring immediate, same day intervention the MASH will be contacted immediately by phone and their advice will be followed.
- For international cases the Safeguarding Lead will contact the relevant authorities in the student's country of residence.

3.5 Contact the police directly (999) if a student is in immediate danger at any time, left alone or missing.

4 Record Keeping, Confidentiality and Information Sharing

4.1 Staff will keep clear detailed records of concerns about students (noting the date, event and action taken) even where there is no need to refer the matter to Social Care Services immediately.

4.2 Ensure all confidential records are kept secure and in locked locations.

4.3 Ensure all relevant child protection records are sent to the receiving school when a student moves.

4.4 Any safeguarding concerns falling under this policy will be treated with sensitivity and appropriate levels of confidentiality in line with GDPR and information sharing guidance.

4.5 Where a decision is made that information will be shared outside of Wolsey Hall College, this should ideally be with the consent of the child or parent. This discussion

must be recorded in writing.

- 4.6 In situations where this is not possible, due to a risk to the child or adult, or where it may have a detrimental impact upon an investigation into a serious crime, the decision not to obtain consent must be recorded

5 Working with other agencies

- 5.1 Co-operation across all agencies is vital to provide the best outcomes for pupils and families. Professionals need to work together, using their skills and experience, to make a robust contribution to safeguarding children and promoting their welfare within the framework of discussions, meetings, Conferences and case management.
- 5.2 If there are any professional disagreements with practitioners from other agencies the DSL will initially raise concerns with the relevant agency manager and then follow the agreed conflict resolution or appeal procedures as laid out in Oxfordshire Children Safeguarding Board Manual.

6 Recognising Abuse

6.1 Types of Abuse include:

- **Physical Abuse** - When a child is hurt or harmed by someone else on purpose. This could include hitting with hands or objects, slapping, punching, kicking, shaking, burning, biting, breaking bones.
- **Sexual Abuse** - Sexual abuse can take place involving contact or with no contact. It includes situations where an abuser makes contact with a child and the contact is sexual. It can include forcing other people to engage in sexual activity. Sexual abuse can also include situations where the sexual abuse does not involve physical contact between the abuser and the victim. This could include exposing or flashing, forcing a child to make, view or share child abuse images or videos, or showing pornography.
- **Emotional Abuse** - Emotional abuse takes place where there is continual and persistent emotional mistreatment of a child. This could include occasions where a child is being deliberately made to feel scared or humiliated. Emotional abuse is often present when there is any other kind of abuse taking place.
- **Neglect** - Neglect is the persistent failure to meet a child's basic needs. A child may be left hungry, dirty, without proper clothing, shelter, supervision or health care. It is the most common type of child abuse.

6.2 Other Types of abuse

There are a number of other ways a child can be abused.

- Bullying / Cyberbullying – behaviour that hurts someone – either in person or online. It is usually behaviour that is repeated over a period of time, and can cause emotional and physical harm.
- Child Sexual Exploitation – a type of sexual abuse, where children are given things (for example money, gifts, affection, alcohol) in exchange for performing sexual activities. Grooming and manipulation is used to persuade victims they are in a loving consensual relationship. Children can be trafficked into the UK in order to be sexually exploited. Violence can be used to ensure compliance.
- Child Trafficking – where children and young people are tricked, forced, or persuaded to leave their homes and are moved or transported and then exploited, forced to work, or sold.
- Domestic abuse – seeing or hearing the abuse of another must be taken into consideration when determining the level of concern. A significant amount of research demonstrates the harm that can be caused to children through living in an environment with domestic abuse.
- Grooming – when someone builds a relationship with a child or adults around them in order to manipulate, exploit or abuse the child.
- Female genital mutilation (FGM) – FGM is when a female’s genitals are deliberately altered or removed for non-medical reasons. It is highly dangerous, and under UK law, FGM is illegal. Children can be at risk when new-born, during childhood, or as a teenager.
- Online abuse – any type of abuse which takes place on the internet. It can take many forms, including emotional abuse, sexual abuse (including sexting), grooming and bullying.

7 Working with Parents

- 7.1 Wolsey Hall is committed to working in partnership with parents positively, openly and honestly to safeguard and promote the welfare of students. It will ensure that all parents are treated with respect, dignity and courtesy. Parents’ rights to privacy and confidentiality will be respected, and the school will not share sensitive information unless it has permission, or it is necessary to do so in order to safeguard a student.
- 7.2 Any concerns will be shared with parents unless to do so may place a student at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a student will not prevent the Designated Person making a referral in those circumstances where it is appropriate to do so. The school will follow the advice in HM Government document Information Sharing, July 2018 and in particular with “The Seven Golden Rules to Sharing Information”. (see

Appendix 7)

- 7.3 Wolsey Hall will: Undertake appropriate discussions with parents prior to involvement of another agency unless the circumstances preclude this. Ensure that parents understand the school's responsibility for child protection by setting out its obligations on the school website by publishing this policy.

8 Safer Recruitment

- 8.1 Wolsey Hall will operate safe recruitment practices including ensuring appropriate checks through the Disclosure and Barring Service (DBS).
- 8.2 A Single Record will be maintained.
- 8.3 The school Policy will ensure DBS checks are undertaken on a three yearly rolling programme for all those working with students.
- 8.4 The school will consult with the Designated Officer from the Local Authority in the event of an allegation being made against a member of staff and will adhere to the relevant procedures set out in statutory guidance and the OSCB Child Protection Procedures manual.
- 8.5 The school will ensure that any disciplinary proceedings against staff relating to child protection matters are concluded in full, even when the member of staff is no longer employed at the school and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable. The school will ensure that all staff and volunteers are aware of the need for maintaining appropriate and professional boundaries in their relationships with students and parents as advised by the school's Staff Code of Conduct.

9 Online Safety

- 6.1 All students enrolling with Wolsey Hall Oxford, and their parents, will be given guidance about keeping safe on our online learning environment, Canvas, and our closed Facebook groups. We will also provide general advice as to where help can be sought if a student or parent should have concerns about any aspect of online use.

10 Other Information

- 10.1 Wolsey Hall Oxford is under a statutory duty to have due regard to the need to prevent people being drawn into terrorism of any form. If there is a reason to believe that a student may be at risk of being drawn into terrorism, action taken will be in line with the [UK Prevent strategy](#), in line with this policy and following normal safeguarding procedures.
- 10.2 This policy should be read in conjunction with Wolsey Hall College's Safer Recruitment policy.

10.3 Where staff are working with a mature student who may have needs for care and support; if they have any concerns that they may be at risk of or suffering abuse or neglect; these must be recorded and discussed with the Safeguarding Lead/s in line with guidance above for children. Any action taken in respect of safeguarding concerns for adults will be in line with the Care Act 2014 and relevant statutory guidance.

10.4 All staff at Wolsey Hall Oxford are committed to undertaking their work with regard to safeguarding at all times. They must comply with this policy, and also undertake to comply with the following:

10.5 Staff must:

- Act in accordance with this policy and procedures
- Remember that someone else might misinterpret your actions, no matter how well intentioned. A clear purpose and transparency to all work undertaken is of paramount importance
- Be aware that social networking sites are in the public domain if not protected by privacy settings. Staff should strongly consider strengthening any privacy settings so that young people would not be able to access information which you would not want in the public domain.
- Communication with students must be via Wolsey Hall Oxford official accounts at all times, and must be for work related purposes. If staff are contacted online by a student or their family, the Safeguarding Lead/s must be informed. As a general rule, this will not be appropriate. There may be situations where contact online outside of official accounts is endorsed (for example family members who are students; a pre-existing friendship prior to becoming connected via Wolsey Hall College) but this should be disclosed to the Safeguarding Lead/s.
- No images in any format will be circulated or stored involving students under 18 without the explicit written informed consent of those involved and their parents / guardians / carers.
- Raise any questions or concerns with the Safeguarding Lead/s, Principal or Director of Studies as they arise.

6.7 Staff must not:

- Engage in communication with young people which is not related to their work with Wolsey Hall College.
- Promise confidentiality to young people in any situation.

- Seek out or add young people on any social networking site.
- Respond to online communication from a young person (outside of Wolsey Hall official accounts).
- Share personal contact details (including email address, telephone number or address) with young people, or seek out their personal contact details
- Arrange to meet a young person
- Make suggestive remarks to a young person, or have inappropriate communication with them

Appendix 1 Procedures for Reporting a Concern

1. If you suspect that there are safeguarding concerns please use the [Cause for Concerns Reporting Form](#)
 - Allow the young person to speak without interruption, encourage them to say what they feel comfortable saying. Be accepting and non-judgmental

about what is said. There must not be any investigative or leading questions of any kind.

- Advise the young person that you can offer support, but that you may need to pass on what they tell you, and you are unable to keep everything they tell you confidential.
- Ensure that the young person understands it is not possible to keep secrets. Where there are concerns around a child or young person being at risk through sharing information, these concerns should be recorded and shared with the safeguarding lead/s.
- Ensure that the young person is not at immediate risk of any further abuse.
- Immediately after a disclosure, make contact with the Safeguarding Lead/s through the Cause for Concern Reporting Form.
- Record and report the facts as you understand them, recording the words of the student and other relevant information.
- Provide this information to the Safeguarding Lead/s at Wolsey Hall Oxford immediately.
- Wolsey Hall Oxford will retain a copy of notifications in accordance with GDPR guidelines.
- Where a referral is made to the Local Authority (UK) or relevant authority (International students) this should be made with the consent of the child and/or their parent carer wherever possible. In some cases, this may be inappropriate (due to risk to the child / young person, or concern that obtaining consent may lead to loss of evidence in a serious crime) but this decision should always be recorded. At all times, Wolsey Hall Oxford will act in compliance with the Data Protection Act 2018, and GDPR.

Where there are concerns that a young person is at risk of or suffering abuse, but this has not been disclosed by the child, Wolsey Hall College staff should:

- Not discuss suspicions with the young person or conduct any form of investigation until the Safeguarding Lead/s have reviewed the concern
- Record and report the facts as known to the Safeguarding Lead/s as soon as possible using the [Cause for Concern Reporting Form](#) using no names.
- The Safeguarding Lead/s will determine the appropriate course of action, and these decisions will be recorded.

Advice and support can always be sought from the DSL at all times.

Appendix 2 Signs and Indicators

- Physical Abuse: Determining whether an injury is accidental or non-accidental is not the role of a member of staff. There are, however, a number of injuries which should be regarded with concern and may indicate a non-accidental cause. Any member of staff noticing an injury, which causes concern must report it. Inadequate,

inconsistent, or excessively plausible explanations, or a delay in seeking treatment for the student, should signal concern.

- Physical indicators:
 - Unexplained injuries or burns, particularly if they are recurrent
 - Untreated injuries or lingering injuries not attended to Bruises and abrasions around the face, particularly if they are recurring
 - Damage or injury around the mouth Bi-lateral injuries such as two bruised eyes
 - Bruising to soft areas of the face, e.g. cheeks
 - Bite marks
 - Burns or scalds [note the pattern and spread of the injury, e.g. cigarette burns]
 - Welts suggesting beatings
- Behavioural Indicators:
 - Improbable excuses given to explain injuries
 - Refusal to discuss injuries
 - Admission of punishment which appears excessive
 - Shrinks from physical contact
 - Refusal/avoiding getting undressed for gym – keeps arms and legs covered in hot weather
 - Fears medical help
 - Self-harming behaviours
 - Aggression towards others
 - Over compliant behaviour or a ‘watchful’ attitude
 - Deterioration in schoolwork
 - Unexplained pattern of absence which may serve to hide bruises or other physical injuries
 - Fears or is reluctant to return home or to have parents contacted
- Emotional Abuse: Emotional abuse is often the most difficult to detect. A student might be clean and physically cared for but be emotionally neglected. The parent’s attitude to the student might be characterised by coldness, hostility, and disinterest. They may resort to scapegoating or humiliating the student and the giving of age inappropriate responsibilities. They may give the impression that the student can never please, or may have expectations which are inappropriate, excessive or unrealistic.
 - Physical Indicators:
 - Delays in physical development, e.g. milestones delayed or underweight, lethargic [there may be medical reasons for this, medical advice is essential]
 - Self-injury
 - Behavioural Indicators:
 - Delays in intellectual development
 - Over-reaction to mistakes
 - Continual self-deprecation
 - Sudden speech disorders
 - Social isolation – does not join in and has few friends

- Extremes of compliance, passivity and/or aggression
 - Compulsive stealing
 - Rocking, thumb sucking, hair twisting, etc.
 - Drug, alcohol, solvent abuse
 - Fear of parents being contacted

- Sexual abuse affects a student emotionally and physically. It is difficult to detect as the physical indicators are not directly visible. Often the indicators that a student is being sexually abused are exhibited through behaviour. Sexual abuse occurs in every social class, cultural and occupational group. Sexually abused children may take refuge in an appearance of normality, e.g. some students immerse themselves in schoolwork as a way of 'blinking out' the abuse. Emotional and behavioural difficulties may result, for example, from abuse and neglect, physical or mental illness, sensory or physical impairment, or psychological trauma. In some cases, emotional and behavioural difficulties may arise from or be exacerbated by circumstances within the school environment, for example, a change in teacher or routine.
 - Physical Indicators:
 - 'Love bites'
 - Other bite marks
 - Self-harming behaviours [e.g.: deep scratches/cuts on arms]
 - Tiredness, lethargy
 - Pregnancy or Sexually Transmitted Infections [STIs].
 - Behavioural Indicators
 - Sudden changes in behaviour and school performance
 - Sexual awareness inappropriate to the student's age – shown for example in drawings, vocabulary, games etc
 - Provocative sexual behaviour
 - Tendency to cry easily
 - Regression to younger behaviour, eg: thumb sucking, playing with discarded toys, acting like a baby
 - Depression and withdrawal

- Neglect: Severe neglect is often characterised by the student being underweight, small in stature and with a poor physique. The care of neglected children is often poor and they present as unwashed, unkempt and inadequately fed and clothed. However, poverty, deprivation and neglect are not the same thing. Students may live in poverty but only a small number of these will be neglected. Assessment over time and with the help of other agencies is vital.
 - Physical Indicators:
 - Constant hunger
 - Poor personal hygiene
 - Constant tiredness
 - Inadequate clothing
 - Untreated medical problems.
 - Behavioural Indicators:
 - Social isolation – does not join in and has few friends

- Low self-esteem
 - Destructive tendencies
 - Poor relationships with peers
 - Compulsive stealing and scavenging
 - Rocking, hair twisting and thumb sucking.
- Disabled students: The signs and indicators of abuse for disabled and non-disabled students are fundamentally the same. However, there may be a greater risk of stereotyping or making assumptions that signs and indicators are due to impairment rather than considering the full range of possibilities, including abuse. For example, displaying challenging or self-injurious behaviour may not be picked up as an indicator of abuse.
 - For some disabled students, signs and indicators may:
 - Be more difficult to recognise
 - Be harder to untangle – especially if there are communication difficulties/impairment
 - Have more possible explanation/be more easily explained away:
 - by the impairment or illness
 - by the medication as ‘it’s always been like this’
 - as attention seeking behaviour
 - as self-inflicted.

Checklists should be used with caution: There may be alternative explanations other than abuse, for any of the signs, e.g. medical conditions. Considering indicators of abuse is often about putting a constellation of factors together, with the help of the Designated Person plus other agencies, sometimes over time.

Appendix 3 Process for dealing with allegations against staff and volunteers

Where concerns are raised about any member of staff with Wolsey Hall College which may fall under this policy, staff must:

- Immediately after receiving an allegation, disclosure, or becoming concerned; contact the Safeguarding Lead/s, Principal and Director of Studies using the [Cause for Concern Form](#)
- Record and report the facts as they are known, including names of all parties, the account provided (using the words of the students where relevant) and any other information considered relevant
- The Designated Lead/s will be responsible for ensuring appropriate steps are taken to respond to the Safeguarding concern (including any referral to the Local Authority Designated Officer (LADO) where relevant. The Principal / Director of Studies will be responsible for any decisions regarding any disciplinary matters.

The term 'Female Genital Mutilation' (FGM) encompasses all procedures that either: Fully or partially remove external female genitalia, or Injure the female genital organs for non-medical reasons.

-
- FGM is usually carried out on girls between the ages of 5 and 14 years, but younger girls and adult women are sometimes victims of this procedure. FGM is extremely traumatic.
- It can lead to serious, life-long physical and mental health problems.
- Internationally, FGM is recognised as a violation of the human rights of girls and women and when performed on a child, is a violation of the Rights of the Child.
- In the UK, under the FGM Act 2003 and the Serious Crime Act 2015, it is an offence for any person (regardless of their nationality or residence status) to: Perform FGM; Assist a non-UK person to carry out FGM outside the UK on a UK national or permanent UK resident.
- The Serious Crime Act 2015 also includes: Provision of lifelong anonymity in the media of FGM; A new offence of 'failing to protect a girl from FGM' – each person responsible for the girl at the time the FGM occurred will be liable; FGM Protection Orders – for the purposes of protecting a girl against the commission of a FGM offence or protecting a girl against whom such an offence has been committed; A new mandatory reporting duty requiring specified regulated professionals (healthcare, social care and teachers) in England and Wales to make a report to the police. The duty applies where, in the course of their professional duties, a professional discovers that FGM appears to have been carried out on a girl under 18 (at the time of discovery).

Identifying a child at risk of FGM - Indications that FGM may be about to take place:

- The family comes from a community that is known to practice FGM (it may also be possible that they will practice FGM if a female family elder is around)
- A pupil talking about a long holiday to her country of origin or another country where the practice is prevalent
- A pupil talking about "becoming a woman" or "rites of passage" or a "special ceremony"
- A pupil may confide in a professional that she is about to undergo a "special procedure" or attend a special occasion
- Becoming withdrawn or acting out of character
- There are older girls or women in the family (e.g. older sister/s, mother) who have undergone FGM;

Identifying a child who has been subject to FGM - Indications that FGM may have already taken place:

- A pupil may spend long periods of time away from education with bladder or menstrual problems
- A prolonged absence from the education with noticeable behaviour changes on the girl's return could be an indication that the girl has recently undergone FGM

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out, in line with the Female Genital Mutilation Act 2003. Unless the

member of staff has a good reason not to, they should also still discuss any such case with the DSL and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases or in cases where the woman is 18 or over. In these cases, members of staff will follow local safeguarding procedures.

For further information:

<https://www.gov.uk/government/publications/female-genital-mutilationguidelines>

on specified authorities, including the local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ('The Prevent Duty').

The Counter-Terrorism and Security Act 2018 also places a duty on local authorities to ensure Channel Panels are in place. The Panel must include the local authority and Chief Officer of the local police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, following a referral from the police and where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals.

The Act will require partners of Channel panels to co-operate with the panel in the carrying out of its functions and with the police in undertaking the initial assessment as to whether a referral is appropriate. Academies and colleges who are required to have regard to "Keeping Children Safe in Education 2020" are listed in the Act as partners of the panel.

The biggest threat is around terrorist groups seeking to radicalise and recruit people. This threat is greater amongst young people. Extremism is defined as a rejection of a cohesive, integrated, multi-faith society and parliamentary democracy. The local agenda supports the Prevent Strategy.

Communities and local authorities have a key part to play in developing a sense of belonging and will be an important part of wider partnership working. The threat is not just from radical religious groups such as 'Islamic State' but also from radical 'far right' and other political groups who may attempt to radicalise children and young people.

If there are concerns that a child or young person may be vulnerable to violent extremism or radicalisation the DSL within the School will be informed and, after initial discussions, a multi-agency referral form will be submitted to the MASH.

As part of the "Prevent Duty", schools must address the four key areas which are: Risk Assessment; Working in Partnership; Staff Training; IT Policies. Safeguarding Policy

- **RISK ASSESSMENT**
School staff should know how to make a referral where they have concerns about potential radicalisation. Advice and guidance can be sought from the DFE who also have a dedicated helpline: 020 7340 7264. Actual Referrals must go to the MASH
- **WORKING IN PARTNERSHIP**
Schools are required to work in partnership with the OSCB, the Home Office trained Prevent Engagement Officers and other partner agencies to safeguard and promote the welfare of children. Prevent Engagement Officers and other partners will be accessed as relevant to provide advice and support with regard to this duty. Effective engagement with parents/carers and their families is also important as they are in a key position to spot signs of radicalisation. The School recognises it is important to assist and advise families who raise concerns and direct them to support mechanisms.
- **STAFF TRAINING**

In line with the Prevent Duty, the School is required to assess training needs in the light of their assessment of risk.

- IT POLICIES

Measures are in place at the School which include filtering and monitoring of online access. Learning experiences are in place, evaluated and regularly reviewed, which help the pupils to understand ways in which to stay safe online.

Suspected on-line terrorist content can be reported to HM Government:
www.gov.uk/report-terrorism

Appendix 6 The Seven Golden Rules to Sharing Information

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018

and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to-date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

The 2018 regulations are made under section 75 of the Childcare Act 2006 (“the 2006 act”). They set out the circumstances in which an individual will be disqualified for the purposes of section 75 of the act.

Section 76(2) of the 2006 act, provides that a person who is disqualified under the 2018 regulations may not:

- provide relevant childcare provision
- be directly concerned in the management of such provision

Under section 76(3) schools are prohibited from employing a disqualified person in connection with relevant childcare provision in the settings set out in the relevant offences and orders section of this guide, unless the individual in question has been granted a waiver by Ofsted for the role they wish to undertake. An employer commits an offence if they contravene section 76(3), except if they prove that they did not know, and had no reasonable grounds for believing, that the person they employed was disqualified.

The criteria for disqualification under the 2006 act and the 2018 regulations include:

- inclusion on the Disclosure and Barring Service (DBS) Children’s Barred List
- being found to have committed certain violent and sexual criminal offences against children and adults which are referred to in regulation 4 and Schedules 2 and 3 of the 2018 regulations (note that regulation 4 also refers to offences that are listed in other pieces of legislation)
- certain orders made in relation to the care of children which are referred to in regulation 4 and listed at Schedule 1 of the 2018 regulations
- refusal or cancellation of registration relating to childcare (except if the refusal or cancellation of registration is in respect of registration with a child minder agency or the sole reason for refusal or cancellation is failure to pay a prescribed fee under the 2006 act (regulation 4(1) of the 2018 regulations)), or children’s homes, or being prohibited from private fostering , as specified in paragraph 17 of Schedule 1 of the 2018 regulations
- living in the same household where another person who is disqualified lives or is employed (disqualification ‘by association’) as specified in regulation 9 of the

2018 regulations (note that regulation 9 only applies where childcare is provided in domestic settings, defined as ‘premises which are used wholly or mainly as a private dwelling’ in section 98 of the act, or under a domestic premises registration, including non-domestic premises up to 50% of the time)

- being found to have committed an offence overseas, which would constitute an offence regarding disqualification under the 2018 regulations if it had been committed in any part of the United Kingdom

The above list is only a summary of the criteria that lead to disqualification. Further details about the specific orders and offences, which will lead to disqualification, are set out in the 2018 regulations.

Schools must ensure that they are not knowingly employing a person who is disqualified under the 2018 regulations in connection with relevant childcare provision. They must also ensure that they do not apply these arrangements to individuals who do not fall in scope or are specifically excluded (as per the staff who may be covered and staff not covered sections of this guidance). In gathering information to make these decisions schools must ensure that they act proportionately and minimise wherever possible the intrusion into the private lives of their staff.

Accordingly, schools must ensure that they handle personal information fairly and lawfully and take care not to breach:

- Data Protection Act 2018 (DPA)
- General Data Protection Regulation (GDPR) (EU) 2016/679
- Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013) (‘the Exceptions Order’)
- Rehabilitation of Offenders Act 1974 (ROA)
- Human Rights Act 1998

Oxfordshire Safeguarding Children Board <https://www.oscb.org.uk/>

Oxfordshire Multiagency Safeguarding Hub

<https://www.oxfordshire.gov.uk/business/information-providers/multi-agency-safeguarding-hub>

Education Safeguarding Advisory Team and LADO

<https://www.oscb.org.uk/practitioners-volunteers/schools-safeguarding-team/>

Oxford Social Care Safeguarding Team Contacts

South Assessment Team

Tel: 01865 897983

Oxford City Assessment Team

Tel: 01865 323048

North Assessment Team

Tel: 01865 816670

Emergency Out of Hours

Tel: 0800 833408

(After 5pm Mon-Thurs and 4pm Friday)

National

National Society for Prevention of Cruelty to Children (NSPCC): <http://www.nspcc.org.uk/>

0808 800 5000

Childline: <http://www.childline.org.uk> 0800 1111

Child Exploitation and Online Protection (CEOP): <http://ceop.police.uk/> 0870 000 3344

Professionals Online Safety Helpline: <http://www.saferinternet.org>

helpline@saferinternet.org.uk 0844 3814772

Parents Protect (Safeguarding Information for Parents, Carers and Staff)

www.parentsprotect.co.uk

PREVENT GOV.UK website <https://www.gov.uk/government/publications/protecting-children-fromradicalisation-the-prevent-duty>

NSPCC Whistleblowing Helpline 0800 028 0285

This policy will be reviewed on

Signed.....(Principal)..... (Director of Studies)

Date.....

Signed (Lead Safeguarding Officer)

Date.....