

SAFEGUARDING & CHILD PROTECTION OXBRIDGE APPLICATIONS POLICY

The following document outlines Oxbridge Application's commitment to Safeguarding and Child Protection.

This document is applicable to all persons under the age of eighteen who are part of an Oxbridge Application programme. It is applicable regardless of gender, religion, beliefs, ethnicity, disability, sexual orientation, or socio-economic background.

The document is split into four sections:

Definitions – Provide a framework for understanding safeguarding and child protection

Statement – our Safeguarding and Child Protection Statement outlines Oxbridge Application's commitment to the safeguarding and welfare of children in our care. It provides an overview of the policy.

Policy – the policy gives specific details on how Oxbridge Applications will protect children in its care. It outlines how we will meet these responsibilities, highlights policies that are linked to safeguarding and child protection and addresses how we will deal with any suspected child protection issues.

Appendices – the appendices contain further policies that are linked to our Safeguarding and Child Protection policy.

SAFEGUARDING AND CHILD PROTECTION DEFINITIONS

In order to understand the policy, it is important to consider the following definitions:

Safeguarding - Safeguarding, and promoting the welfare of children, is a broader term than child protection. It encompasses ensuring the general welfare and happiness of students in our care, child protection and any policies linked to looking after children in our care.

Safeguarding children is defined, according to Keeping Children Safe in Education 2022, as

- protecting children from maltreatment;
- preventing the 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 outcome.

Child abuse is a form of maltreatment of a child. A person may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. They may be abused in a family or institutional setting by someone they know, who may be an adult, adults, a child or children

Child Protection - Child protection is part of safeguarding and refers to activities undertaken to prevent children suffering, or likely to suffer, significant harm or abuse. The following are the main categories of abuse:

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.

Physical abuse happens when a child is deliberately hurt, causing injuries such as cuts, bruises and broken bones. It can involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, slapping or suffocating. It is also physical abuse when a parent or carer fabricates, or induces, the symptoms of an illness in a child.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities. It does not necessarily involve violence and the child may or may not be aware of what is happening. Sexual abuse includes: grooming a child with the intention of sexually abusing them; all forms of penetrative and non-penetrative sex; sexually exploiting a child in return for gifts, money or affection; and making, looking at and distributing indecent images of a child. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual

abuse is not solely perpetrated by adult males. Females can also be abusers as can other children.

Neglect is persistently failing to meet a child's basic physical and/or psychological needs resulting in serious damage to their health and development. Neglect is more difficult to define than other forms of abuse but generally refers to the absence of something such as love or attention (Daniel et al, 2011). In practical terms, neglect may involve a parent's or carer's failure to:

- provide adequate food, clothing and shelter
- protect the child from physical and emotional harm or danger
- supervise the child properly
- make sure the child receives appropriate medical care or treatment.

Neglect often happens at the same time as other types of abuse

Emotional abuse is persistent and, over time, it severely damages a child's emotional development. Emotional abuse can be active or passive. Active emotional abuse involves an adult deliberately trying to scare, humiliate or verbally abuse a child. Passive emotional abuse happens when a parent or carer denies the child the love and care they need in order to be healthy and happy. Such adults might be emotionally unavailable; fail to offer their child praise and encouragement; interact with them in an age-inappropriate way; be over-protective, limiting their opportunities to explore, learn and make friends; or expect the child to meet the parent's own emotional needs.

Indications of Abuse

Abused children may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend. Anyone working with children or young people needs to be vigilant to the signs listed below.

Whilst these signs do not necessarily mean that a child is being abused, they may indicate that further investigation is required:

- Regularly experiencing nightmares or sleeping problems.
- Changes in personality.
- Outbursts of anger.
- Changes in eating habits.
- Self-harming (includes head banging, scratching, cutting).
- Showing violence to animals, toys, peers or adults.
- Knowledge of "adult issues", e.g. alcohol, drugs, sexual behaviour.
- Lacking in confidence or often wary/anxious.
- Regressing to the behaviour of younger children.
- Regular flinching in response to sudden but harmless actions, e.g. someone raising a hand quickly.

SAFEGUARDING AND CHILD PROTECTION POLICY STATEMENT

Oxbridge Applications is committed to Safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. We have a comprehensive Safeguarding and Child Protection Policy and procedures in place which all employees, volunteers and contractors are expected to adhere to.

Safeguarding and Child Protection is **everybody's responsibility**. We recognise that we have a fundamental duty of care towards all children we engage with including a duty to protect them from abuse. We aim to achieve this through compliance with child protection laws and best practice guidelines. This is facilitated through a comprehensive staffing structure.

We recognise that:

- The welfare of children is paramount.
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.
- Working in partnership with children, young people, their parents, carers and protection agencies is essential in promoting young people's welfare.

The purpose of the policy is:

- To help make sure that children who engage in Oxbridge Applications programmes are safe and protected;
- To provide a common understanding of child protection issues and inform staff of best practice;
- To provide step-by-step guidance to staff on what action to take if there is an allegation of or concern about actual or suspected situations of abuse.

This policy is mandatory for all Oxbridge Applications staff. This includes anyone who works for Oxbridge Applications, either in a paid or unpaid, full or part time capacity. This includes directly employed staff, contractors, and partner agencies.

We will seek to protect children by:

- Valuing them, listening to and respecting them.
- Adopting child protection systems and procedures for staff.
- Ensuring all necessary staff checks are made such as Enhanced DBS checks.
- Sharing information about child protection and good practice with staff, children and parents/carers.
- Sharing information about concerns with agencies who need to know and involving parents and children appropriately.
- Providing effective systems and daily routines to ensure that children are thoroughly supervised.
- Providing effective management for staff through supervision, support and training.

We will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood.

This statement provides a summary of our commitment to the Safeguarding and protection of children in the care of Oxbridge Applications. Our full Safeguarding and Child Protection Policy is available on request at all public events and at our Head Office.

SAFEGUARDING AND CHILD PROTECTION POLICY

1. Introduction

1.1 This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; The Education Act 2002, and in line with government publications: "Working together to safeguard children" 2018, "What to do if you are worried a child is being abused 2015", "Keeping Children Safe in Education 2020" and "Keeping Children Safe in Education 2022".

1.2 We recognise that all adults that come into contact with children under our supervision have a full and active part to play in protecting them from harm and ensuring that their welfare is our paramount concern.

"Doing nothing is not an option" (Lord Laming, 2003)

1.3 All staff understand that our events should provide a caring, positive safe and stimulating environment that promotes the development of our students during their stay with us.

1.4 It is important for all staff to understand that they must act immediately if they have a concern about a child.

1.5 The Aims of the policy are:

- 1.5.1 To support all students who attend our courses and ensure that they feel safe, secure, valued and respected
- 1.5.2 To provide a positive environment in which a student feels that they can approach any member of staff, should they have any difficulties, and that they will be listened to and supported by that member of staff
- 1.5.3. To raise awareness of all staff at the event about their responsibilities in identifying and reporting possible cases of abuse or misconduct
- 1.5.4 To emphasise the need for good communication between staff in regard to safeguarding concerns
- 1.5.5 To develop a structured procedure at events which will be followed by all members of staff in case of suspected abuse or misconduct
- 1.5.6 To ensure that all staff working with students are recruited in line with our Recruitment Policy

2. Safe Event, Safeguarding Culture

2.1 We will ensure that:

- 2.1.1 There is a Safeguarding and Child Protection policy in place, that this is reviewed and updated with good practice and the policy is shared with all staff.
- 2.1.2 There are procedures for dealing with allegations of abuse.
- 2.1.3 All Oxbridge Applications staff will undertake safeguarding training at the start of the events season and all adults working at events will be briefed fully on the policy in advance of any event. Tutors will also be sent the policy in advance.
- 2.1.4 Any weaknesses in the Safeguarding and Child Protection Policy are remedied immediately.
- 2.1.5 Safeguarding and Child Protection policies and procedures are reviewed annually.
- 2.1.6 All staff understand their responsibility under the Staff Code of Conduct.

3. Responsibility for Child Protection

3.1 The safeguarding of students at an event is the responsibility of every member of staff but the Event Lead will act as the safeguarding lead for that specific event and will report to the Designated Safeguarding Lead at Oxbridge Applications if they have concerns about possible abuse.

3.2 The Event Lead's contact details will be made available in the event office for 24-hour support and should be the first point of contact.

3.3 Event Leads are responsible for:

- 3.3.1 Referring a child if there are concerns about possible abuse, using the Referral Form
- 3.3.2 Ensuring there are written records of concerns about a child even if there is no need for immediate referral
- 3.3.3 Ensuring that all such records are kept confidential and securely and are separated from regular student record sheets
- 3.3.4 Holding and disposing of all records in line with our Data Protection Policy
- 3.3.5 Ensuring that the existence of such a record is marked clearly on the student record sheet
- 3.3.6 Liaising with other agencies and professionals, under the direction of the Designated Safeguarding Lead for Oxbridge Applications.

3.4 The Designated Safeguarding Lead for Oxbridge Applications is responsible for:

- 3.4.1 Organising Safeguarding and Child Protection training and briefing for all staff at the event
- 3.4.2 Supporting the Event Leads by liaising with other agencies and professionals, as necessary
- 3.4.3 Keep accurate and confidential records securely on safeguarding concerns.
- 3.4.4 Keeping up to date with current legislation

3.4.5 To be trained at an advanced level in safeguarding and to update this qualification every 2 years.

3.5 The Regulatory and Compliance Director is responsible for;

- 3.5.1 Supporting all students and staff if a concern is raised by being available for advice and guidance
- 3.5.2 To take management responsibility for a situation if requested by company senior staff

4. Preventing Unsuitable People from Working with Children

4.1 All staff and tutors at the events will have Safeguarding and Child Protection awareness briefing at the event to ensure that they are aware of their responsibilities.

4.2 All staff are recruited according to the Oxbridge Applications Recruitment Policy

4.3 There are very few situations where a tutor at an event will need to be in a room alone with students. If a tutor does not have a DBS check and it will be the Event Lead's responsibility to ensure this person is not left unsupervised with students.

4.4 All staff including tutors and consultants are expected to read this policy and to raise any concerns or if clarification is needed by contacting their Event Lead or the Designated Safeguarding Lead for Oxbridge Applications.

5. Procedures

5.1 If a child protection concern is raised at one of our events then the Event Lead will act immediately to ensure the safety of all students at that event.

5.2 All members of staff know how to respond to a child who discloses abuse. Guidelines for this process can be found in Appendix 1 and will be discussed with staff during the event or lesson briefing.

5.3 Allegations against Staff

- 5.3.1 All staff and tutors should take care not to place themselves in vulnerable positions with students
- 5.3.2 All staff and tutors should be aware of Oxbridge Applications' policies on *Behaviour Management* and the *Staff Code of Conduct*
- 5.3.3 Guidance about staff conduct and safe practice will be given during event briefing
- 5.3.4 We understand that a student may make an allegation against a member of staff

- 5.3.5 If such an allegation is made, or information is received that suggests that an adult working at one of our events may be unsuitable to work with children, the member of staff receiving the allegation or becoming aware of the information should immediately inform the Event Lead.
- 5.3.6 The Event Lead will discuss the content of the allegation with the Designated Safeguarding Lead for Oxbridge Applications and if necessary the Company Safeguarding Lead if the allegations raise Child Protection concerns
- 5.3.7 If the allegation is made against the Event Lead then the information should be passed directly to the Designated Safeguarding Lead for Oxbridge Applications or in their absence, the Company Safeguarding Lead
- 5.3.8 It may be necessary to suspend and remove a member of staff from the site following a concern being raised, to allow for a full investigation to take place
- 5.3.9 Auxiliary discussions will be held with the Designated Safeguarding Lead for Oxbridge Applications and the Company Safeguarding Lead to establish further steps, including suspension and termination of the staff member's contract
- 5.3.10 Any allegation made against a member of staff working with students aged 18 and below will be reported to the Local Authority Designated Officer/Designated team (LADO), who will decide any further action to be taken
- 5.3.11 Any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service for consideration for barring following their resignation or dismissal

5.4 Low-Level Concerns about staff

5.4.1 The safety and wellbeing of children is dependent on the vigilance of all our staff and their prompt communication to the DSL or another member of the safeguarding team of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. All references in this section to "adult" should be interpreted as meaning any adult (defined above) and any visitor, unless otherwise stated.

5.4.2 The notification and prompt handling of all concerns about adults is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation found to be substantiated.

5.4.3 A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note

that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

5.4.4 Our low-level concern policy

The intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines.
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards
- provide for responsive, sensitive, and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

5.4.5 What is a low-level concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt'.

5.4.6 Low-Level Concerns about self (self-reporting)

From time to time an individual may find him/herself in a situation which might appear compromising to others, or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard expected. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the company sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

5.4.7 Low-Level Concerns about an adult

From time to time an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse.

5.4.8 What should I do if I have one?

Where a low-level concern exists, it should be reported to the DSL or another member of the safeguarding team as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (Where the concern relates to a particular incident).

5.4.9 What records will be kept?

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- a) the concern (or group of concerns) has been reclassified as an allegation as above;
- or
- b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability, or disciplinary procedure.

5.5 Allegations against other Children (child-on-child abuse)

5.5.1 Children can abuse other children at any age. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

5.5.2 If the allegation involves another child the procedure outlined in Appendix 1: *"Child Protection Guidance Notes to all Event Staff: How to Respond to Allegations of Abuse from a Child"* must be followed.

5.5.3 There will be a need to distinguish between actions that can be dealt with through normal disciplinary channels and those that constitute potential abuse where the involvement of other statutory agencies is required. If in any doubt the member of staff who witnesses the incident or to whom it is disclosed must directly contact the Designated Safeguarding Lead for Oxbridge Applications.

5.5.4 Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

6. Sharing Information

6.1 It is important that children, parents and staff are all made aware of our Safeguarding and Child Protection Policy. Set out below are the steps taken to ensure that each party has received the relevant information:

6.1.1 *Students*

The names of the Event Lead for each event will be clearly displayed informing students that they can approach this person with concerns. Students will be made aware that should they have any concerns they can talk to any member of staff. This information will be passed to students through the welcome talk and student notice boards.

6.1.2 *Staff and Tutors*

All new members of staff will be given a copy of our Safeguarding and Child Protection Policy. All tutors will be informed of the policy and given an online link to read it. They will also receive relevant training whilst at the event.

6.1.3 *Parents*

The full policy will be available to parents, guardians and agents on request.

7. Confidentiality

7.1 We recognise that all matters relating to Child Protection are confidential.

7.2 The Designated Safeguarding Lead for Oxbridge Applications, Company Safeguarding Lead and Event Leads will disclose any information about a child to other members of staff on a need-to-know basis.

7.3 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

7.4 All staff must be aware that they cannot promise a child to keep secrets which may compromise the child's safety or wellbeing.

8. Supporting Staff

8.1 We recognise that any staff member who becomes involved with a child who has suffered, or appears to have suffered harm, may find the situation stressful and upsetting.

8.2 We will support such staff through discussions with the Director of People and seek further support as appropriate.

9. Supporting Students

9.1 We will support all children by:

- 9.1.1 Encouraging self-esteem and assertiveness, through the event programme as well as our relationships, whilst not condoning aggression or bullying.
- 9.1.2 Promoting a caring, safe and positive environment within the events.
- 9.1.3 Encouraging students to be open and feel that they can share information if they wish with any adult in the event whom they trust. We should not pry into a child's life but provide an environment in which the children feel safe and secure and where they will have the maximum opportunity to speak freely about concerns and worries.
- 9.1.4 Liaising and working together with other support services and agencies involved in the safeguarding of children.

9.2 We recognise that a child who is abused or is witness to violence may feel helpless and humiliated, may blame themselves and find it difficult to develop and maintain a sense of self-worth.

9.3 We recognise that there are certain areas for concern that deserve particular attention and that all adults working with children should be aware of:

9.3.1 *Female Genital Mutilation*

We recognise that female genital mutilation (FGM) is a violation of the human rights of girls and women and a form of abuse. If any member of staff suspects that FGM is a risk, is imminent, or has already taken place on a student, they must inform the Designated Safeguarding Lead for Oxbridge Applications. The Designated Safeguarding Lead for Oxbridge Applications will liaise with the Company Safeguarding Lead, and together they will take steps to inform the relevant authorities. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

9.3.2 *Child Sexual Exploitation*

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (e.g. food, accommodation, drugs, alcohol, gifts, money or affection) as a result of engaging in sexual activities. Sexual exploitation involves varying degrees of coercion, intimidation or enticement. It can include unwanted pressure from peers to have sex, sexual bullying including cyberbullying or grooming. It is also important to recognise that some young people who are being sexually

exploited do not exhibit any external signs of abuse. If any staff member is concerned that a student is caught up in CSE they must share their concerns with the Event Lead or Designated Safeguarding Lead for Oxbridge Applications.

9.3.3 Child Criminal Exploitation

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

9.3.4 Domestic Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

9.4.5 So Called 'honour-based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

9.4.6 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

10. Preventing Radicalisation

10.1 Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks,

staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement

10.2 The Prevent Duty. All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

10.3 Channel. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools and colleges to make referrals if they are concerned that an individual might be vulnerable to radicalisation.

11. Whistle Blowing

11.1 All staff should be aware of their duty to raise concerns in regard to Child Protection. Raising concerns in this way is referred to as "Whistle Blowing". Such concerns may include, but are not limited to: witnessing an incident, overhearing an inappropriate comment, becoming aware of the attitude and actions of another member of staff towards a student. Concerns should be raised directly to the Event Lead, or if the concerns are about the Event Lead to the Designated Safeguarding Lead for Oxbridge Applications.

12. Physical Intervention

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

12.2 Such events should be recorded and signed by a witness on an incident report form.

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

13. Other Related Policies

13.1 *Anti-Bullying*

Oxbridge Applications's policy on bullying is set out in our Anti-Bullying Policy. This covers our guidelines and procedures for when we suspect one student may be bullying another. Any incident of a staff member being suspected of bullying a student will be treated as a Child Protection concern and dealt with in line with section 5.3: "Allegations Against Staff".

13.2 *Health and Safety*

Our Health and Safety Policy and Guidelines are set out in a separate document. They establish the consideration that Oxbridge Applications has given to the protection of students within the event environment.

13.3 *E-safety*

All students are required to comply with an *Internet Code of Conduct*, which outlines acceptable I.C.T. usage and offers guidelines on e-safety. Additionally, all staff are required to comply with a separate I.C.T. Policy and a Social Media and Networking Policy, which details acceptable I.C.T. usage, staff responsibility for promoting e-safety amongst students and also provides boundaries and guidance on contact between staff and students.

13.4 The following policies are appendices to the Safeguarding and Child Protection Policy:

- Allegations Against Staff
- How to Respond to Allegations Against Staff
- Referral and Assessment Form

13.4 The following policies are linked to the Safeguarding and Child Protection Policy:

- Staff Code of Conduct
- Anti-Bullying
- Health and Safety
- Medical
- ICT

14. Monitoring and Evaluation

14.1 Our Safeguarding and Child protection Policy will be monitored and evaluated by:

- Discussion with the Event Leads
- Staff Questionnaires
- Reviewing students logs
- Review of any safeguarding concerns and the outcomes to any concern raised
- Annual Safeguarding report made by the Designated Safeguarding Lead for Oxbridge Applications to the Director of Consultancy and the Regulatory and Compliance Director (Company Safeguarding Lead).

15. Policy Review

15.1 The policy will also be reviewed in line with any significant changes to the law and guidance published by Government.

15.2 The policy will be reviewed by Designated Safeguarding Lead for Oxbridge Applications and Dukes Education Regulatory and Compliance Director (Company Safeguarding Lead)

Safeguarding and Child Protection Appendix 1

Child Protection Guidance Notes to all Event Staff:
How to Respond to Allegations of Abuse from a Child

It is not for staff to decide if the allegations are true or not. Their role is only to listen, report as accurately as possible and allow the official procedure to then take over.

When listening to a disclosure, staff should:

- Stay calm and be available. (The student has put their trust in you.)
- Find out the general subject area. Ask **'What is it about?'**
- If subject matter does require privacy and you are in public place, suggest to student to go somewhere quieter.
- Tell another staff member where you are and that you are having a private meeting with a student.
- Try to sit at right angles to student rather than directly opposite or next to them. Be open and ready to listen. Ask **'What do you want to tell me?'**
- Be open, calm, patient and listen. Your role is only to hear what they have to say - try and remember their exact words.
- If appropriate, you can say; **'Is there anything else you want to tell me?'**
- If the student hasn't already told you, you are allowed to ask only **'When did this happen?'**
- When student has told all they want to, reassure them and say **'You've done the right thing to tell me.'**
- Find somebody responsible (usually another staff member) to sit with them whilst you respond.
- Tell the Event Lead what has happened.
- Immediately afterwards, write a report of the meeting using the student's exact words, giving only facts and record time, date, place etc.
- Ensure the report is filed in proper (secure) place.
- Once you have handed the matter over to the Event Lead (or other senior staff) and completed and filed your report, and you know the student is being looked after, (it may be appropriate to go and see the student again to make sure they are OK), make sure you look after yourself. Being told information about child abuse is often very upsetting.

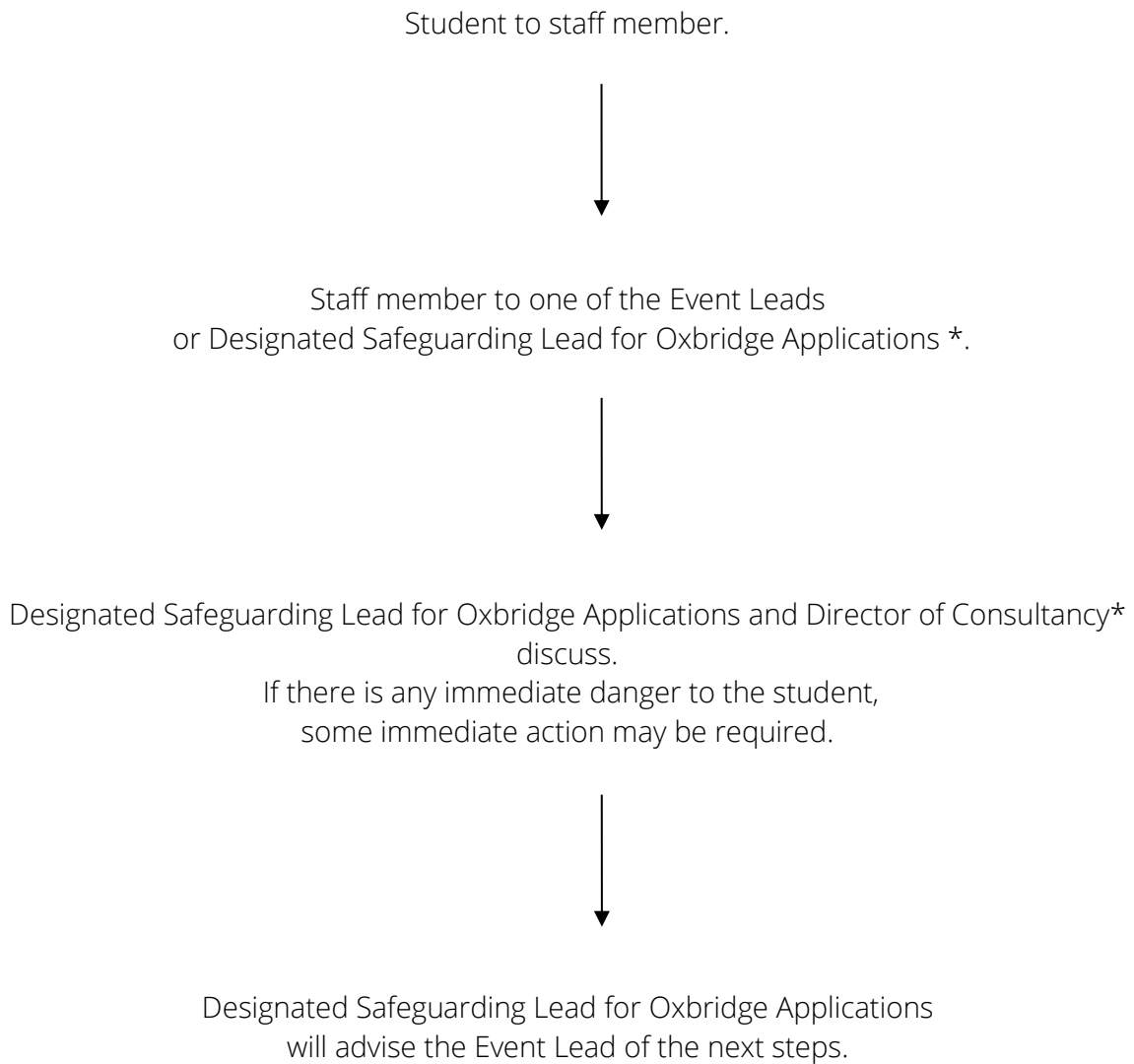
When listening to a disclosure, staff should not:

- Refuse to listen; e.g. tell them you're too busy or to see them later. Or over-react.
- Assume it's something related to abuse.
- Start asking more questions. Show worry or concern with your facial expressions.
- Be in a room on your own with a student with the door closed.
- Draw too much attention to the situation.

- Promise confidentiality if they ask you to keep a secret. Explain *'If it's necessary, I will tell somebody else (who can help more than I can.)'*
- Put words in their mouth or make any comments on what they tell you.
- Write while they are talking to you.
- Ask any direct or leading questions or start probing. (That could jeopardise any subsequent police investigation, if that becomes necessary.)
- Leave the student alone after they've disclosed. Make it clear to staff member sitting with student not to ask any questions; just be a reassuring presence
- Tell any colleagues what the student has said (apart from one of those listed as needing to be told).
- Write any opinions or draw any conclusions about anything. Don't write any comments about the accused.
- Try and 'improve' the student's English if it wasn't grammatically accurate or vocabulary was wrong. (That is a job for any police or social services people to do.)
- Talk to any colleagues about what has happened.

The Disclosure Pathway

In the event of a Child Protection disclosure the following pathway should be followed. All stages should be documented and reports to the Event Lead.

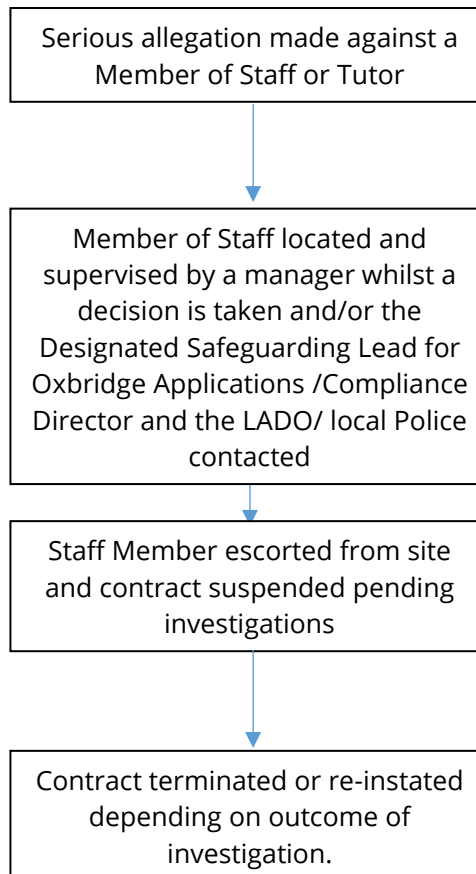


*At any time during this process, the Designated Safeguarding Lead for Oxbridge Applications and/or the Director of Consultancy may consult with the Regulatory and Compliance Director.

Safeguarding and Child Protection Appendix 2

Child Protection: Allegations against Staff or Tutors

Any allegation made against a member of staff in regard to Child Protection will be taken seriously by the management team at the event and the Designated Safeguarding Lead for Oxbridge Applications. In the nature of a serious allegation the following process will be followed:



Examples of serious allegations include, but are not limited to: bullying, assault, sexual harassment, grooming, or any other activity that may pose a risk to the safety or welfare of one of our students.

Any member of staff against whom a significant allegation has been made will be removed from the site and suspended from their role pending investigation. We would offer the member of staff ongoing support; however, the safety and welfare of our students is paramount.

In the event of more minor allegations (examples set out under Appropriate Behaviour in Staff Conduct guidelines), an internal investigation will be carried out by the Event Lead and disciplinary action may be taken, up to and including dismissal.

Any allegations made against staff that are founded will be recorded on their staff file.

Safeguarding and Child Protection Appendix 3

Referrals Form

Form to be completed as soon as possible after an allegation has been made by the member of staff whom the allegation has been made to. Once completed the form should be passed to the Event Lead or Designated Safeguarding Lead for Oxbridge Applications at the event.

Date & time (form submitted)	
Name of event	
Referrer's name and contact details	

Details of staff/adult who the allegation has been made against

Full name	
Date of birth	
Gender	
Nationality	
Any disability?	
Role/connection with event	
Home address	

Details of student involved in the allegation

Full name	
Date of birth	
Gender	
Nationality	
Any disability?	
Home address	
Parent's name	

Details of alleged incident

Date and time of incident	
Place of incident	
Brief circumstances of incident	
Names of potential witnesses	

Nature of allegation

Category (physical/sexual/emotional/neglect)	
Was technology involved? What type?	
Is there any other information that you think it is important to share?	

Signed (by person submitting referral)

Contact Information

Designated Safeguarding Lead for Oxbridge Applications
Theo Boyce
Theo.boyce@dukeseducation.com
020 7499 2394

Consultancy Director
Alicia Luba
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020 7499 2394

Dukes Education Regulatory and Compliance Director
Paul Ludlow
07584 012 130

I have read and understood the Safeguarding Policy 2022.

Name _____ Signature _____

Date _____