Safeguarding

OXFORD SPIRES
INTERNATIONAL

Contents

Introduction & Safeguarding Definitions

The Oxford Spires International Safeguarding policy is a group wide policy for Oxford Active including the following Ofsted and British Council accredited programmes.

- Oxford Spires International (Multi-centre accredited language school provider for young learners)
- Active Camps (A UK day camp provider, Including 'Adventure' & 'Plus' Courses)
- Active Clubs (A UK before and after school club provider)

The term **"Safeguarding"** is defined as:

1. Protecting children from maltreatment
2. Preventing impairment of children's health or development
3. Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
4. Taking action to enable all children to have the best outcomes

For the purposes of this policy, "a child" is anyone under the age of 18.

Oxford Active acknowledges its duty of care to safeguard and promote the welfare of children using its services. This policy outlines the measures taken to ensure that our safeguarding practices always reflect statutory responsibilities and put the welfare and interests of children first . Our policy is written in accordance with "Working Together to Safeguard Children 2018" and "Prevent Duty Guidance for England and Wales 2015".

A child-centred approach is fundamental to safeguarding and promoting the welfare of every child.
A child-centred approach means keeping the welfare of the child as the primary focus in all decision making, working in partnership with them, their families and local authorities.

Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Statement of Intent

Oxford Active fulfils this duty through employing the following:

- All members of staff working with children are required to undertake appropriate safeguarding training relevant to their role, including the Prevent Duty, to ensure that they have up-to-date knowledge of safeguarding issues, are able to identify signs of possible abuse and neglect at the earliest opportunity, and know how to respond in a timely and appropriate way.
- Each setting has a named Designated Safeguarding Lead (DSL), who has undertaken safeguarding lead training in line with the Oxfordshire Safeguarding Children Board.
- To prevent the employment of unsuitable individuals, all staff at Oxford Active are employed in line with the Safer Recruitment procedures as outlined in the Safer Recruitment policy found in appendix 4.

- The use of mobile phones and cameras by all adults at settings is strictly controlled - this is covered in the Mobile Phone and Cameras policies found in appendix 6
- Staff will seek to build children's resilience to radicalisation by promoting fundamental British Values, in order to provide a safe environment which allows children to discuss sensitive or controversial issues openly.

Concerns, Suspicions & Investigating
In all cases where abuse (see APPENDIX 1) is suspected or being investigated

All concerns, suspicions and investigations must be thoroughly, factually documented. This document should include the child's name, address and date of birth, timed and dated observations which objectively describe the child's behaviour and appearance and, where possible, the exact words spoken by the child. These records should be kept separately from the main records of the child. All recorded concerns should be signed and dated.

All concerns, investigations and subsequent documentation are to be kept confidential. These records should only be shared with those who need to know - the setting DSL and at least one member of The Oxford Active Safeguarding Team (TOAST) – unless otherwise advised by the Multi-Agency Safeguarding Hub (MASH), or the Local Authority Designated Officer (LADO).

Safeguarding Concerns & Disclosures
- Whilst it is not staff's responsibility to diagnose abuse, it is however, their duty to alert the appropriate authorities if they have knowledge of the abuse or neglect of a child, or concerns about the welfare and safety of a child.
- Concerns over changes in a child's behaviour or appearance, unexplained bruising or marks, any comments made by a child or any deterioration in a child's general well-being should be reported promptly to the setting's DSL. A summary of the different categories of abuse is contained in Appendix 1.
- Whenever concerns are raised due to possible signs of abuse, the child and/or the child's parent or carer will initially be consulted for an explanation, and this will be recorded.
- If any explanations fail to allay fears for the child's safety, then the setting's DSL will contact the local **MASH**, and will also report the concern to **TOAST**.
- If there is any doubt or uncertainty about whether the concerns require escalation, a no-names consultation will be sought with the local MASH by the concerned adult or DSL.
- Staff will keep parents/carers fully informed of any actions they undertake unless advised otherwise by the investigating authority.
- When a setting is based in the school the child attends, it may also be appropriate to consult the school's DSL so that relevant information can be shared.
- If children are suspected to be at risk of radicalisation, a referral should be made to Channel via MASH.
- When **definite** concerns about abuse arise (for example, if a child confides in an adult about abuse taking place) then the appropriate MASH should be contacted **without delay** by the DSL.
- Once MASH has been informed of the allegation, TOAST carry forward the responsibility of liaising with the relevant agencies and authorities.

Whistle Blowing (Allegations Against Staff Members)

- Staff should take proactive measures to protect themselves against misunderstandings and false allegations. This includes avoiding being alone with any child at any time. Additionally, being mindful of any physical contact or inappropriate language/ conversation topics.
- Any concerns or allegations against members must be reported to the DSL, who must record the details of the incident and report this to the LADO **immediately.** In this circumstance, delays of even an hour could severely harm the subsequent investigation.
- If the allegations are against the DSL, they must be reported directly and immediately to
- TOAST.
- The DSL for the setting must also report this, simultaneously, to a member of TOAST, unless otherwise advised by the LADO.
- In Ofsted registered settings, any allegations against staff will be reported to Ofsted as soon as possible by TOAST.
- Once the LADO has been informed of the allegation, TOAST carry forward the responsibility of liaising with the relevant agencies and authorities.
- Staff will co-operate entirely with any investigation carried out by the LADO.
- Any staff suspected of abuse will be suspended from duty immediately on full pay whilst the allegation is investigated. This is not an indication that the alleged incident has taken place, but is to protect the staff member, as well as children and families, throughout the process. If the allegation is unsubstantiated, the member of staff may return to work.

How to Handle a Disclosure

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Know	Record	Report
• Stop & Listen • Never make a promise • Keep calm, don't panic and don't appear shocked or angry • Keep responses short, simple, slow and gentle • Avoid making judgements • Avoid criticising the alleged perpetrator • "What you are saying is important" • "I'm glad you were able to tell me" • "I will do my best to help you" • This is so important; I need to talk to someone about it"	• Do not ask leading questions • Make brief notes • Tell the child they are not to blame and have done the right thing by telling you • **Be factual** • Us an incident form • Remember to write any questions you may ask the child as well as their responses • Keep any notes in the child's own words • Date and time • Print and sign you name • Record as much detail as possible • Uphold confidentiality • Never think a concern is too small – it could from part of the bigger picture around the child	• Never attempt to carry out an investigation • Do not delay in passing on concerns • Report the incident to your DSL • Follow the Escalation Process • Protect and support the child • Keep the child informed

LSCB, MASH & LADO County Contacts for all Oxford Active Settings

Local Safeguarding Children's Board (LSCB)	Multi Agency Safeguarding Hub (MASH)	MASH (Out of hours)	Local Authority Designated Officer (LADO)	LSCB Web address
Oxfordshire	0845 050 7666 mash-childrens@oxfordshire.gcsx.gov.uk	0800 833408	01865 810603 LADO.safeguardingchildren@oxfordshire.gov.uk	www.oscb.org.uk
Wokingham	0118 908 8802	01344 786543	0118 9746141 LADO@wokingham.gcsx.gov.uk	www.wokingham.lscb.org.uk
Warwickshire	01926 414144 johncoleman@warwickshhire.gov.uk	01926 886922	01926 743433 LADO@warwickshire.gov.uk	www.warwickshire.gov.uk/mash
Bromley	0208 4617373 0208 4617309 mash@bromely.gov.uk	0300 3038671	020 846 17669 rita.dada@bromely.gov.uk	www.bromley.gov.uk/info/200127/
Cambridgeshire	03450451362 Referralcentre.children@cambridgeshire.gov.uk	01733234724	01223727967 lado@cambridgeshire.gov.uk	www.safeguardingcambspeterborough.org.uk
Southampton	02380833336 mash@southampton.gov.uk	02380233344	01962 876364	www.hampshiresafeguardingchildrenboard.org.uk
Gloucestershire	01452 426565 childrenshelpdesk@gloucestershire.gov.uk	0800 5420202	01452 426320 https://qes-online.com/Gloucestershire/eLADO/Live#!/Public	www.gscb.org.uk

The above grid is a list of relevant, current contacts, relating to the following agencies:

1. Local Safeguarding Children's Board (LSCB)

2. Multi Agency Safeguarding Hub (MASH)

3. Local Authority Designated Officer (LADO)

4. Local Safeguarding Children's Board (LSCB) Website

APPENDIX 1 - Categories of Abuse
The table below outlines the four main categories of abuse as defined by the Department of Health 'Working Together to Safeguard Children' document 2010. Staff should be aware that the possible indicators are not definitive and that some children may present these behaviours for reasons other than abuse.

Type of Abuse: Neglect	Possible Indicators

• The persistent failure to meet a child's basic physical and psychological needs, likely to result in the serious impairments of the child's health or development
• Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:
  o Provide food, clothing and shelter
  o Protec a child from physical and emotional harm or danger
  o Ensure adequate supervision
  o Ensure access to appropriate medical care or treatment
	Obvious signs of lack of care, including:
	• Problems with personal hygiene
	• Constant hunger
	• Inadequate clothing
	• Emaciation
	• Lateness or non-attendance
	• Poor relationship with peers
	• Untreated medical problems
	• Compulsive stealing and scavenging
	• Rocking, hair twisting, thumb sucking
	• Running away
	• Low self-esteem

Type of Abuse: Physical Abuse	Possible Indicators
• May involve; hitting, shaking, throwing, poisoning, burning or scalding. Drowning, suffocating, or otherwise causing physical harm to a child • Physical harm may also be caused when a parent or carer fabricates the symptoms or, or deliberately induces illness in a child	• Physical signs that do not tally with the given account of occurrence • Conflicting or unrealistic explanations of cause repeated injuries • Delay in reporting or seeking medical advice
Type of Abuse: Sexual Abuse	Possible Indicators
• Forcing or enticing to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening • The activities may involve physical contact, penetrative or non-penetrative acts and includes children in watching pornographic material or watching sexual acts	• Displays of affection which are sexual and age inappropriate • Sudden change in behaviour • Tendency to cling or need constant reassurance • Tendency to cry easily • Regression to younger behaviour • Unexplained gifts or money • Depression and withdrawal • Wetting/soiling day or night • Fear of undressing
Type of Abuse: Emotional Abuse	Possible Indicators
• The persistent emotional maltreatment of a child as to cause severe and persistent adverse effects on the child's emotional development • It may involve conveying to children that they are worthless or unloved. Inadequate, or valued only insofar as they meet the needs of another person	• Isolation • Rejection • Child being blamed for actions of an adult • Child being used as a carer for young siblings • Affection and basic emotional care giving/warmth, persistently absent or • withheld

This is by no means an exhaustive list. There are several other safeguarding issues that staff should be aware of such as:

- Child sexual exploitation (CSE)
- Forced marriages (FM)
- Female Genital Mutilation (FGM)
- Prevent
- Homelessness
- Children in the court system
- Children missing from education
- Children with family members in prison
- Child criminal exploitation
- Domestic Abuse
- So-called "Honour based violence"
- Sexting in schools

Further training in each of these categories is available through Oxfordshire Safeguarding Children Board (OSCB). This can be arranged on request.
Oxford Active acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring practice reflects statutory responsibilities, government guidance and complies with best practice and British Council requirements.

Statutory Guidance & Compliance

The policy gives due regard to statutory guidance and complies with the following legislation as follows:

Organisation	Website/Resource
Section 11 Children Act 2004	Current Legislation
Section 17 & 47 Children Act 1989	Current Legislation
Working together to safeguard children	A guide to inter-agency working to safeguard and promote the welfare of children
The Prevent Duty	Departmental advice for schools and childcare providers
Information Sharing	Advice for practitioners providing safeguarding services to children, young people, parents and carers
Counter Terrorism Act	Explanatory notes relate to the Counterterrorism and Security Act 2015
Keeping Children Safe in Education	Statutory guidance for schools and colleges
UN Convention on the Rights of the Child1989	How we Protect Children's Rights with the UN Convention on the Rights of the Child
What to do if you're worried a Child is being Abused?	Advice for practitioners
NSPCC	www.nspcc.org.uk
Barnardos	www.barnardos.org.uk

APPENDIX 2 – Safeguarding Escalation Process and Contact Details

The following is guide for staff on the Escalation Process if there are any concerns that a child or student could be at risk or that abuse may have been occurring.

Escalation Process

Responsibility of reporting staff member

Responsibility of DSL

TERMINOLOGY	
DSL	Designated Safeguard Lead
MASH	Multi Agency Safeguarding Hub
LADO	Local Area Designated Officer
TOAST	The Oxford Active Safeguarding Team

If you have any concerns that a child nay be at risk or that abuse may have been occurring

Does it implicate a staff member?

Yes — **No**

Does it implicate your setting DSL? — **Report to your DSL**

Yes — **No** — **Who will escalate to MASH**

Report Directly to LADO — **Report to your DSL** — **DSL should then inform TOAST**

Inform TOAST — **Your DSL will report to LADO**

DSL should then inform TOAST

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APPENDIX 3 – Safeguarding Contact Information – Oxford Spires International

Designated Senior Person: Matt Simmonite

The Oxford Active's Safeguarding Team (TOAST):

Oxford Active Designated Safeguarding Lead Peter Parry on 01865 594324 or 07984 011987

Oxford Spires International Designated Safeguarding Lead Matt Simmonite: 07966 153955

Active Camps Designated Safeguarding Lead Dan Kettle on 07900 956103

Active Clubs Designated Safeguarding Lead Emma Cooper on 07733 446124

Please note if you are unable to contact your company's Safeguarding Lead you can contact any other member of TOAST.

Oxford Spires International Individual Responsibilities

Oxford Spires International - Safeguarding Chain

The Designated Senior Person (DSP)

Matt Simmonite, Director

Designated Safeguard Lead Jenni Lee, Operations

Deputy Designated Safeguard Lead Matt Simmonite & Paul Girling, Operations

Designated Safeguarding Person on Centre

Centre Manager

Safeguarding Support Team

Welfare

All remaining Oxford Spires International Staff

The Oxford Active Safeguarding Team (TOAST

1. Matt Simmonite
2. Peter Parry
3. Jenni Lee
4. Dan Kettle
5. Emma Cooper

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The Oxford Active Safeguarding Team (TOAST) Responsibilities

The Designated Senior Person (DSP) (Matt Simmonite, Director)
- The DSP is supported by Peter Parry (Head of Safeguarding, Oxford Active). The DSP has the overall view of the Oxford Spires International procedures and deputies the daily safeguarding responsibilities to the Designated Safeguarding Lead who is supported by a team of Deputy Safeguarding Designated Persons.
- Trained to Safeguarding Level 3

DSL Designated Safeguarding Lead (Jenni Lee)
- Trained to Safeguarding Level 3 – DSL
- The Designated Safeguarding Lead has responsibility for the safeguarding and welfare of students, supported by all members of summer school staff
- Providing advice and support to all staff on issues relating to child protection
- Reporting any concerns about Adults that pose a risk to children to the Local Authority Designated Officer (LADO)
- Concerns raised by children or staff on behalf of children to the Local Safeguarding Partners (LSP) and the police
- Maintaining a complete and up-to-date record of all child protection-related concerns, issues, incidents, reports, referrals and complaints
- Ensure safeguarding standards are communicated to all staff and training is enough and appropriate

Deputy Designated Safeguarding Leads (Matt Simmonite, Paul Girling)
- Trained to Safeguarding Level 3 – DSL
- Responsible for supporting the Designated Safeguarding Lead in their daily duties and overall responsibilities
- Ensuring that all staff training required and completed in relation to child protection is recorded and audited regularly to identify training needs and any recording gaps
- Ensuring that all students have enough and appropriate means to report concerns, issues and incidents. Assume DSL duties and responsibilities in their absence or handle any complaints or allegations against the nominated lead if appropriate

Designated Safeguarding Person on Centre (Centre Manager)
- Trained to Safeguarding Level 2
- Overall accountability for the safeguarding and welfare of students lies with the Centre Manager for each centre
- Point of contact for all centre staff for welfare or safeguarding concern
- Ensuring that all students receive a full induction and timely updates on matters relating to safeguarding and welfare
- As line managers to individual centres, the DSP on Centre is accountable for ensuring Centre Management Teams, Welfare Officers and all members of staff implement the Safeguarding Policy
- Responsible for the day to day functioning of the team

Safeguarding Support Team (Welfare Team)
- Basic Safeguarding training
- Our Welfare members of staff are the point of contact for students with everyday queries, needs or

concerns relating to their welfare
- Welfare members of staff closely monitor and document student welfare and maintain accurate records of the issues of day to day issues and outcomes, reporting any issues to management that they feel are more serious

All Staff Members
- Basic Safeguarding training
- All staff share a responsibility to protect students from harm, which includes being vigilant in identifying signs and symptoms of physical and psychological abuse and neglect and reporting any concerns in accordance with our policy

Staff Training & Induction Process

Staff Training

All new and returning staff undergo training to ensure they are sufficiently prepared for their role and responsibilities. Safeguarding plays a key element.

Handbooks

All employees will be required to read our Safeguarding Policy as part of their induction process. The importance of safeguarding children is also included in each role specific handbook.

Online Training

All employees will follow , the following Safeguarding training prior to their arrival:

1. **Safeguarding – Oxfordshire Safeguarding Children Board**
   An Introduction to Safeguarding' (level 1 – Introductory)

2. **Prevent – HM Government E-Learning Training on Prevent**
   This is introductory training. It will provide an important foundation on which to develop further knowledge around the risks of radicalisation and the role that you can play in supporting those at risk

The online training is supported by a full description of our policies, procedures, practices and provisions in relation to the safeguarding of our students.

Staff must bring their 'Certificate of Successful Completion' with them on their arrival at the centre, prior to commencing their duties.

Centre Arrival

The centre arrival induction is designed to reinforce the points above (and other training elements explicit in the online training, policies and handbooks) and provide centre specific information. All staff are required to sign their induction form to record that they have received and understood the training and documentation, which includes Safeguarding.

Continuing Professional Development (CPD)

If any areas are identified as lacking, staff will receive the necessary training. Head Office will also conduct centre visits whereby staff will be randomly selected and tested on their safeguarding knowledge.

Safer Recruitment and Recruitment Policy
Oxford Active place the safeguarding and safety of all children and young people as their number one priority, and therefore follow a strict safer recruitment policy, to protect both the children and young people and the staff working within the individual centre settings, and wider offices.

APPENDIX 4 – Safer Recruitment Policy
Oxford Active is committed to the welfare of all children and young people using its services. The following procedures are in place for the recruitment of staff to ensure all staff coming into contact with children are fully checked and are deemed suitable.

Staff are recruited using the following procedures:

- All staff taking part in the recruitment process will be trained in Safe Recruitment
- Safeguarding requirements for staff are made clear in all job adverts
- All candidates must complete a Job Application form
- Candidates are interviewed by two members of staff
- Two satisfactory references are required for each member of staff, ideally from their most recent employer and/or someone who can best judge their suitability to work with children (e.g. college tutor, scout leader)
- Staff may be allowed to start work pending the receipt of the second reference if the first reference has been verified by a telephone call
- Where possible, candidates will be required to complete a trial session at the setting before the post is formally offered
- All job offers are made subject to satisfactory completion of a probation period

DBS Disclosures

- Staff should have an enhanced DBS disclosure before starting work. In certain circumstances, it may be possible for staff to start work whilst waiting for a DBS check to come through – if this is the case, a risk assessment will be completed and if judged safe, the member of staff will be allowed to work under supervision and not be left alone with children at any time. (For Language School Teachers, part of this risk assessment will include a Barred List check.)

- All staff working with a member of staff without a completed DBS disclosure will be made aware of their status so that they are never given unsupervised access to children.

- In certain circumstances, it may be possible to accept an existing DBS disclosure. Following Ofsted guidelines, these circumstances would be:

1. The level of the existing DBS check is the same level needed by Oxford Active

2. The DBS check is less than 12 months old (3 months for Oxford Spires International Language teachers, who will also need to be checked on the barred list)

3. The existing DBS check is for a similar post in the children's workforce

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4. There are no unexplained gaps in a person's employment – a DBS check will not be used if there has been a break of more than three months in service

5. The person's identity has been checked to ensure it matches the DBS check. The existing check has been done with an organisation which demonstrates safe recruitment procedures and who is able to confirm the status of the DBS is still correct to their knowledge.

6. The DBS certificate will be seen and checked by an Oxford Active Manager

- In line with Ofsted guidelines, it is our policy not to routinely repeat DBS checks unless there is a break in employment, or we are given information that suggests a person may no longer be suitable to look after children. However, we do currently aim to ensure each member of staff has a DBS disclosure no more than three years old.

- Wherever possible, Oxford Active will use the new DBS on-line update service to check the status of staff's DBS checks and we encourage all new staff to subscribe to this.

Overseas Criminal Record Checks

- If a candidate has lived overseas in the 5 years preceding a job offer, a criminal record check from each country they have spent a continuous period of 3 months or more will be required.

- If it is found that it is not possible to obtain a criminal record check from a particular country, a reference will be obtained from an appropriate referee in that country covering the time they spent there.

- If an overseas criminal record is not complete before the starting dates of the candidate, a risk assessment will be completed. If judged safe, the member of staff may be allowed to work under supervision and not be left alone with children at any time.

- All staff working with a member of staff with incomplete checks will be made aware of their status so that they are never given unsupervised access to children.

Qualifications

- Where posts require a particular qualification, evidence of the qualification will be checked, and a copy of the certificate will be kept on file

- For Language School teachers, non-standard TEFL qualifications will be investigated to ensure they meet the required standard

Other Safeguards

- All staff are required to sign a Staff Suitability Declaration annually
- If any member of staff has incomplete checks before their start date, a risk assessment will be completed and, if judged safe, they will be allowed to work under supervision and not be left alone with children at any time, until full checks are completed.
- All staff working with a member of staff without completed checks will be made aware of their status so that they are never given unsupervised access to children.
- All staff are given training in safeguarding when they start work and this is reviewed on a regular basis.

APPENDIX 5 - Information Sharing Myths

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.

Myth-busting guide to information sharing information enables practitioners and agencies to identify and provide appropriate services that safeguard and promote the welfare of children.

Below are common myths that may hinder effective information sharing.

Data protection legislation is a barrier to sharing information No – the Data Protection Act 2018 and GDPR do not prohibit the collection and sharing of personal information, but rather provide a framework to ensure that personal information is shared appropriately. In particular, the Data Protection Act 2018 balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them.

Consent is always needed to share personal information No – you do not necessarily need consent to share personal information. Wherever possible, you should seek consent and be open and honest with the individual from the outset as to why, what, how and with whom, their information will be shared. You should seek consent where an individual may not expect their information to be passed on. When you gain consent to share information, it must be explicit, and freely given. There may be some circumstances where it is not appropriate to seek consent, because the individual cannot give consent, or it is not reasonable to obtain consent, or because to gain consent would put a child's or young person's safety at risk.

Personal information collected by one organisation/agency cannot be disclosed to another
No – this is not the case, unless the information is to be used for a purpose incompatible with the purpose for which it was originally collected. In the case of children in need, or children at risk of significant harm, it is difficult to foresee circumstances where information law would be a barrier to sharing personal information with other practitioners14.

The common law duty of confidence and the Human Rights Act 1998 prevent the sharing of personal information
No – this is not the case. In addition to the Data Protection Act 2018 and GDPR, practitioners need to balance the common law duty of confidence and the Human Rights Act 1998 against the effect on individuals or others of not sharing the information.

IT Systems are often a barrier to effective information sharing
No – IT systems, such as the Child Protection Information Sharing project (CP-IS), can be useful for information sharing. IT systems are most valuable when practitioners use 14 the shared data to make more informed decisions about how to support and safeguard a child.

APPENDIX 6A: Policy for Use of Mobile Phones, Cameras, Social Medial and Electronic Communication (Oxford Spires International)
Oxford Spires International is committed to ensuring the safety of children in our care. We recognise the importance of mobile phones for communication purposes but are aware that casual or inappropriate use of mobile phones and technology in the childcare setting could pose a risk to children and staff.

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Mobile Phones
In order to remain contactable always during their shift, which is particularly important when offsite, all staff members must carry their mobile phone with them during working hours.

Staff must not have their phones on display or use their phones at any time for social purposes during lessons or whilst supervising students in any capacity.

Sharing Contact Details
Staff must not share their personal contact details with any student before, during or after a programme.

Students will be asked for their contact number by the Centre Manager upon arrival and their numbers will be stored securely. Student contact numbers will be shared on a need-to-know basis with other staff members.

If it is necessary for staff to share contact details with a student (for example, for the student to have unsupervised free time), an offsite phone contact number is given, and student details are recorded on the register.

At School and In the Classroom
Staff may use their phone in order to avoid leaving their class during a lesson, if they need assistance from a senior staff member (for example, a student is missing).
Staff may use their phone if it is for the educational benefit of the class (for example, setting up a phone

interaction quiz on the IWB).

Offsite
Staff may use their personal phones, if they wish, to contact fellow staff members, as necessary for the organisation and safety of the trip (for example, coordinating with coach drivers).

Staff must take an offsite phone when they take students offsite, which is the only contact number they can share with students, and the only contact number they can use to communicate with group leaders during working hours.

At the Residence
Staff must always carry their phones whilst on duty at the residence but should avoid having them out and visible to students wherever possible.

Personal Use of Phones (staff)
Staff needing to use their phone for emergency personal reasons during working hours are expected to find cover for their students before removing themselves to do so.

If staff are likely to receive an emergency personal call, they should make sure the centre manager is aware in advance.

Student Phones
Students are permitted to have their phones with them in the classroom, but they must be on silent and in their bags unless the authorised by their teacher to use them for an activity.

Students must have their phones with them when travelling to and from school (homestay) and during any unsupervised free time on excursions.

During excursions, students may use their phones to take photographs, but must not use them to the detriment of their safety (for example, when crossing roads). Staff should monitor this.

Students may use their phones for personal calls during their breaks, lunch hour and chill out time.

<u>Photography</u>
Staff must not take photographs of any students, for any reason, on their personal devices.
Photography is permitted with the Centre Manager's work phone, or on the school cameras.

Photos should never be transferred from a company camera or phone onto a personal device without explicit permission from the Centre Manager.

Group Leaders
Group Leaders are not permitted to take photographs of any children not in their group without consent from the Centre Manager.

With the Centre Manager's permission, they may be able to photograph other students, as part of a bigger group, but never individually

APPENDIX 6B: Policy for Use of Mobile phones and Cameras (AC,ASC,AA,A+) (Oxford Active)

Oxford Active is committed to ensuring the safety of children in its care. We recognise the importance of mobile phones for communication purposes but are aware that casual or inappropriate use of mobile phones in the setting could pose a risk to children.

Setting phone

Each setting will have its own mobile phone, and this number will be given to parents/carers and others who may need to contact the setting. There may also be occasions when the Manager's personal phone is used as their work phone.

Staff personal mobile phones

Staff will not be permitted to use their personal mobile phones whilst working. They will be required to switch their personal mobile phones off or leave them in a safe place. Managers may carry their personal phones when they are working but will only use them for essential work-related communication.

Where it is essential for staff to make or receive a personal call during a session, staff should seek permission from the Manager and do this in a separate area not used by children. Staff will not be permitted to take photographs using their phone at the setting. Any staff caught breaking these rules may be subject to disciplinary action.

Children

Children are asked not to bring mobile phones into the setting. If they do bring them, it will be at their own risk and they will not be permitted to use them during camp or club hours unless given permission and supervised by a member of staff.

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Photographs

It is recognised that one of the key ways to support children's development, and engage parents in children's learning, is through photographs that record their children's activities and achievements. We will seek permission from parents/carers to take photographs of their children for this purpose, using the setting's own camera.

Staff's personal camera or video functions on mobile phones will not be used in the setting.

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APPENDIX 7: Managing Risk Onsite

Oxford Active rents a variety of premises in the course of everyday business, this includes both open and closed access sites. This appendix stipulates the processes that should be followed to assess and mitigate the safeguarding implications of the way access is controlled and supervised at each of these locations.

There will be differences to how safeguarding is delivered at each centre due to location, physical layout of campus/building, type of program and age range of children/young people. For this reason, a comprehensive risk assessment is carried out at each site, before the start of any program. This is done to identify vulnerabilities and to define strategies to mitigate these and reduce the overall risk to the students and young people or to improve the accountability or ability to investigate a safeguarding concern or allocation.

Each risk assessment will pay particular attention to accessibility by the general public, visitors, shared site access, recruitment standards, unsupervised students and young people and the implications of the age range included on the programme (in particular when 18 year old students come as part of a group).

Each risk assessment must be reviewed by senior management before the start of any delivery, to ensure the level of remaining risk is within reasonable limits. This assessment is then shared with all staff working onsite and is to remain under constant review. It is the responsibility of the DSL for that site to review and update this document as and when new risks or strategies are identified.

If Oxford Active is not the exclusive organisation on any particular site, due diligence is required on all other operating organisations to ensure their compliance with our standards. This should be detailed in the site risk assessment. In particular, the following need to be obtained from each separate organisation onsite:

- A declaration outlining each organisation's safer recruitment policies and evidence that this has been followed.
- Clear premise boundaries agreed between Oxford Active and any other organisations on site, including any areas of shared use identified.
- An outline of each organisation's visitor policy including their level of supervision whilst on site and responsibility of recording attendance.
- Each organisation's public/employers' liability certificate