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## Safeguarding policy

<b>Location</b>	Oxford Campus, C/o Activate Learning, Jericho Building, Oxford OX1 1SA
<b>Monitoring</b>	The Principal and/or DSL and Assistant DSL
<b>Designated Safeguarding Lead (DSL)</b>	<b>Dr. Miriam Schmidkonz</b>
<b>Deputy DSL</b>	Birgit Muller, Emmanuelle Tameze Aoutsa
<b>Overall responsibility</b>	Board of Directors
<b>Created</b>	August 2021
<b>Last review date</b>	December 2025 – under review by OfS
<b>Next review date</b>	August 2026 or as necessary

### 1. Introduction and Statement

EM Normandie UK Limited (hereafter 'EMN' or 'the school') recognises its duties in relation to safeguarding and promoting the welfare of children and adults at risk as detailed under the 'Children Acts' 1989 and 2004, 'Working Together to Safeguard Children 2023', 'Keeping children safe in education 2024' and the 'Care Act 2014'.

EM Normandie UK Limited operates a business school for post A-level degree courses. The normal age of students ranges from 18 to 25 but exceptions can be made for applicants who are 17 years old, where appropriate. The school does not provide residential accommodation to students and we have grave concerns regarding the safety of students under the age of 17 living independently. The school is unable to provide the supervision and assistance necessary for students under the age of 17 and/or for students who, because of their particular personal circumstances, may be considered more vulnerable than their peers, and who live independently. As we are not in a position to meet the needs of these students outside of the school environment, we are advising that any student under the age of 17 be placed under the supervision of and to live with, an accredited UK guardian who assumes full responsibility 'in loco parentis'. A guardianship agreement is also recommended to all parents of 17-year old foreign students.

### 2. Scope and commitment

This policy applies to all staff, including senior managers, committee members, contractors, volunteers, agency staff, students and/or anyone in a position of trust.

- A child is defined as a person under the age of 18 (The Children's Act 1989)
- For the purpose of this policy, the term 'young people' is sometimes used to describe 16 and 17-year old children.
- An Adult at Risk is defined under the Care Act 2014 and the Office for Students' safeguarding guidance (2022), as a person of 18 years or over who is at increased risk but cannot protect themselves from harm



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or exploitation due to an illness, disability, mental health problems or other impairment which means they cannot make independent decisions or care for themselves.

For the purpose of this policy, we also consider as 'Adults at Risk' persons who may be susceptible to radicalisation because of their personal circumstances, needs or other underlying factors such as, but not limited to, issues in relation to gender identity, ethnicity, religion, background, isolation, low self-esteem or feelings of injustice. Please consult the EM Normandie Prevent policy, section 4., *Process of Radicalisation*, for more information regarding underlying factors which may driving and contributing to radicalisation, as well as signs that may cause concern.

We are fully committed to safeguarding and protecting the welfare of all children, young people and adults at risks and are taking all reasonable steps to promote safe practice and protect them, from harm, abuse, neglect and exploitation.

EMN acknowledges its duty to act appropriately with regards to any allegations towards any member of staff, contractor, student or visitor or towards any disclosure or suspicion of abuse.

We believe that the welfare of all children, young people and adults at risks is paramount and, regardless of age, ability, gender, racial heritage, religious or spiritual beliefs, sexual orientation and /or identity, they have the right to equal protection from harm or abuse.

Some children, young people and adults at risks are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues.

We understand that, working in partnership with children, young people and adults at risks, their parents, guardians, carers or other agencies is essential in promoting their welfare.

We will provide all our members of staff with the necessary training, guidance, leadership and support which to enable them to fulfil their roles under this policy.

### **3. Legal Framework**

This policy has been developed for EM Normandie UK Limited in accordance with the principles established by the following legislation and guidance:

- Children Act 1989
- Children Act 2004
- Equality Act 2010
- Children and Families Act 2014
- Special educational needs and disability (SEND) code of practice: 0 to 25 years
- What to do if you are worried a Child is being Abused 2015
- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education 2024
- Oxfordshire Safeguarding Children Board guidelines
- Care Act 2014

### **4. Purpose of Policy**

The purpose of this policy is to



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- protect children, young people and adults at risk who are studying at EMN from maltreatment, inside or outside their home, including online
- enable the relevant members of staff to provide the help and support to meet the needs of children, young people and adults at risk who are studying with us, as soon as problems emerge
- provide all those in a position of trust with the overarching principles that guide our approach to safeguarding and child protection

To keep children, young people and adults at risk who are studying at EMN safe, we will:

- provide a setting where students of all ages and abilities feel listened to, safe, secure, valued and respected
- appoint a Designated Safeguarding Lead (DSL) to ensure a clear line of accountability with regards to safeguarding concerns
- ensure all those in positions of trust have been provided with up to date and relevant information, training, support and supervision to enable them to fulfil their role and responsibilities in relation to safeguarding and child protection
- provide a clear procedure to follow when safeguarding and child protection concerns arise
- ensure effective and appropriate communication between all individuals in a position of trust
- build strong partnerships with other agencies to promote effective and appropriate multi-agency working, information sharing and good practice.

## 5. Organisational Policies and Procedures

This policy should be read alongside EMN's organisational policies and guidance, which are available on the company's website at [www.em-normandie.co.uk](http://www.em-normandie.co.uk), such as but not restricted to the

- Safe Recruitment policy
- Prevent Policy
- Data Protection Policy
- Staff Code of conduct
- Health and Safety Policy
- Anti Bullying and Harassment Policy
- Whistleblowing Policy
- Statement on the Freedom of Speech
- Substance Misuse Policy
- Anti-slavery Policy

## 6. Roles and Responsibilities

Every member of staff, contractor, volunteer and visitor at the school must commit to

- undertaking the required level of training for their role in line with Oxfordshire Safeguarding Board standards, every 3 years for Generalist and Advanced Safeguarding and every 2 years for Designated Leads
- familiarise themselves with this Safeguarding and Child Protection Policy and all relevant policies and procedures published on our website, read and adhere to these policies and discuss questions or concerns with the DSL



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- understand expected standards of behaviour in relation to child students and adults at risk
- understand the different types of abuse, be able to recognise the possible risks and indicators, be able to respond appropriately
- understand their responsibilities to prevent or reduce opportunities for others to abuse children and adults at risk
- encourage a culture of listening to children and adults at risk and taking account of their wishes and feelings
- be aware of the importance and the rules of information sharing both within the school and with multi-agency practitioners where necessary
- understand their responsibility to report any concerns that a child or an adult at risk is being, or is at risk of being, abused or neglected, including any concern they may have regarding another person's behaviour towards a child or children and/or adults at risk
- record and store information legally, professionally and securely in line with organisational policies and procedures
- understand the lines of accountability for reporting safeguarding concerns and be fully aware of the organisation's safeguarding lead and their role within the organisation

**Please see Appendix A for guidance on procedures**

**Please see Appendix B for a summary of the different types of abuse and possible indicators**

**Please see Appendix C for all important contact details**

The Board of Directors is ultimately accountable for ensuring settings provided by EMN are safe, including the implementation of effective safeguarding procedures.

This policy is available to all and can be accessed at [www.em-normandie.co.uk](http://www.em-normandie.co.uk)

## **7. Safer Recruitment**

Safe recruitment is central to the safeguarding of children, young people and adults at risk. All organisations that employ people to work with children in a position of trust have a duty to safeguard and promote their welfare. This includes ensuring that the organisation adopts safe recruitment and selection procedures which prevent unsuitable persons from gaining access to children, young people and vulnerable adults.

Please see the school's Safe Recruitment Policy which can be accessed at [www.em-normandie.co.uk](http://www.em-normandie.co.uk)

## **8. Monitoring and Review**

The policy will be reviewed on a regular basis. All individuals in a position of trust should have access to this policy. A register will be kept recording completion of training courses.



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## Appendix A

### Child and Adult at Risk Protection and Safeguarding Procedures

#### A. Introduction

We have a duty of care towards any child, young person or adult at risk, if we believe or suspect that they

- have suffered significant harm
- are likely to suffer significant harm
- have a disability, developmental and welfare needs which are likely only to be met through provision of family and/or other support services
- are a Child in Need whose development would be likely to be impaired without provision of service

#### B. Students raising concerns regarding a person who may be at risk of radicalisation (please also see Annex C)

If you have concerns regarding another student or other member of the EMN community who may be at risk of radicalisation, please contact immediately

- your Student Life Officer
- your Head of Programme
- the Principal
- any other member of the EM Normandie UK management team in Oxford

**or call 999 if you believe there may be an imminent threat.**

#### C. What to do if you are concerned about a child or adult at risk

##### Supporting children, young persons and adults at risk

If/when a person reports they are suffering or have suffered significant harm through abuse or neglect, or that someone has been or is causing physical or sexual harm to others, the initial response from all professionals should be to listen carefully and observe the behaviour of the child or adult at risk and circumstances to

- clarify the concerns
- offer re-assurance about how the child, or others who are being harmed will or may be kept safe
- explain what action will be taken and within what timeframe.

The person must not be pressed for information, led or cross-examined or given false assurances of absolute confidentiality, as this could prejudice police investigations, especially in cases of sexual abuse.

- (i) If the person is a child or young person and can understand the significance and consequences of making a referral to children's social care, they should be asked for their views.

It should be explained to the child that whilst their view will be considered, the professional has a responsibility to take whatever action is required to ensure the child's safety and the safety of other children.



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- (ii) If the person is an adult at risk, their right to choose must be respected and no referral can normally take place without their consent. However, where it becomes clear that the person is at risk of significant harm and in our professional opinion they are unable to protect themselves from such harm, EMN reserves the right to contact Adult Social Services for assistance and advice to ensure we act in line with our duty of care in the best interest of the person.

#### **D. Confidentiality**

Children have a right to confidentiality under Article 8 of the European Convention on Human Rights. It's important to respect the wishes of a child or of any person who doesn't consent to share confidential information.

If you're not given consent to share information, you may still lawfully go ahead if the child appears to be experiencing, or appears to be at risk of experiencing, significant harm.

EM Normandie reserves the right to act in the same way in the case of adults at risk who appear to be experiencing or appear to be at risk of experiencing, significant harm.

Child and adult at risk protection concerns, disclosures or safeguarding allegations made against a person in a position of trust must not be discussed across the workforce as a whole. This information should be shared solely with Designated Safeguarding Leads, Children's/Adult Social Care and/or the Local Area Designated Officer (LADO) as appropriate (please see Appendix C for details).

Personal information which is shared by the child or an adult at risk on a 1:1 level, such as sexual orientation or gender identification, should not be disclosed to the workforce as a whole.

If members of staff wish to discuss situations with colleagues to gain a wider perspective, this should be done on an anonymous basis with names and other identifying information relating to the child or adult at risk and their family remaining strictly confidential.

#### **E. Seven golden rules for information sharing**

1. Remember that the 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 if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason 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 certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.



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5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

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.

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.

#### **F. Reporting safeguarding concerns regarding a child or adult at risk**

The following procedures apply to all staff working with child students and adults at risk. Their aim is to provide a robust framework which enables staff to take appropriate action if they are concerned that a child or adult at risk is being harmed or may be at risk of being harmed.

We recognise the importance of sharing information and reporting concerns to ensure children are protected. The prime concern must be the interests and safety of the child. The welfare of the child is always paramount.

We also recognise the right of adults at risk to make decisions they are able to make. Adults have a right to make unwise decisions. However, in order to determine whether a person has the capacity to make a decision, it may be necessary for EM Normandie to consult specialised services and professionals.

##### When a child or adult at risk makes a disclosure, the member of staff should

- make brief notes as soon as possible after the conversation
- record the date, time and place and any noticeable non-verbal behaviour and the exact words used by the person
- draw a diagram or refer to a diagram template to indicate the position of any bruising or other injury
- record statements and observations rather than interpretations or assumptions
- sign and date the notes
- pass original notes and records to the DSL promptly. No copies should be retained

##### Following the receipt of concerns, the DSL must

- decide whether there are sufficient grounds for suspecting significant harm. If so, a referral must be made to MASH (children) or the Safeguarding Adults Assessment Team (adults at risk) or the Police. A referral, where appropriate, should be made as soon as possible
- record the reason for this decision. Share the facts, any suspicions or allegations, whether there has been contact with the family or not, and any other relevant information
- inform the child's family, or guardian, unless doing so might place the child at increased risk or could impact a police investigation. If in doubt, the DSL should discuss this with MASH and/or the Police

**Keep in mind that schools do not investigate where there are protection concerns**

##### Record keeping during and after a referral

Where a safeguarding issue is noted, all concerns, discussions, decisions and reasons for these, have to be recorded in writing, including names of those involved in the decision taking and other action and details for how matters were followed up.



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### Confidentiality

All matters relating to Safeguarding are confidential.

- the Principal, school DSL or deputy DSL will disclose any information about a student or other person to other members of staff on a need to know basis only
- the Principal, School DSL or deputy DSL have a professional responsibility to share information with other agencies where they believe this is necessary in order to safeguard children
- all staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing
- adults at risk should be advised that we may need to seek advice from specialised services and/or professionals
- there is a lawful basis for child protection concerns to be shared with agencies which have a statutory duty of child protection

### **G. Allegations against others working with children or Adults at Risk**

All allegations of abuse by those who work with children and/or adults at risk must be taken seriously, whether they are in a paid or unpaid capacity. This procedure should be used if it is alleged that a member of staff, a contractor, volunteer or visitor, has

- behaved in a way that has harmed or may have harmed a child or adult at risk
- possibly committed a criminal offence against or related to a child or adult at risk
- behaved towards a child/children, an adult at risk/adults at risk, in a way that indicates he or she may pose a risk of harm to children or adults at risk

If a child student or an adult at risk or their representative makes a complaint of abuse against a member of staff, the person receiving the complaint must

- take the complaint seriously and immediately inform the Principal and/or DSL and/or deputy DSL
- any concern must be brought to the attention of the DSL or deputy DSL, either directly or via the Principal
- make a record of the concerns reported, including details of anyone else who is said or says to have witnessed the alleged incident
- if the allegation concerns the Principal, the person receiving the complaint will inform the DSL or, if the Principal is the acting DSL or the DSL is unavailable, the deputy DSL(s) and jointly they will inform the Chair of the Board of Directors:

**Jean-Louis Grégoire, [jegregoire@em-normandie.fr](mailto:jegregoire@em-normandie.fr).**

- the DSL, in consultation with the Principal and/or the deputy DSL(s), will decide if the allegation needs to be referred to the LADO or the police for investigation. If the allegation is for a serious criminal offence, it may be necessary to do so before informing the member of staff



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- if it is decided by the DSL and Principal and/or deputy DSL(s) that a referral is not indicated at that stage, the Principal will investigate following the school's disciplinary procedures
- careful consideration needs to be given to the suspension of the member of staff against whom an allegation has been made. Any suspension must be seen as a neutral action which does not predict the outcome of any disciplinary process
- no member of staff can be party to any investigation regarding complaints against them

**To report an allegation or concern about a person in a position of trust, please contact the LADO and Safeguarding Team on 01865 810603 or email: [LADO.safeguardingchildren@oxfordshire.gov.uk](mailto:LADO.safeguardingchildren@oxfordshire.gov.uk)**

#### H. Whistleblowing

We recognise that children and adults at risk cannot be expected to raise concerns in an environment where those in a position of trust fail to do so. All those in a position of trust should be aware of their duty to raise concerns about dangerous or illegal activity, or any wrongdoing within their organisation.

Whistleblowing is a term used when staff want to report a concern within their organisation that involves their manager or a person senior to them. This may prevent them from feeling able to follow the normal report procedures.

There are a limited number of areas that can be called 'Whistleblowing' and it is important that staff be protected from sanctions for raising concerns.

The Principal is responsible for all EMN staff. If anyone has concerns regarding a member of staff who is not following safeguarding processes or behaves in a way that is placing children or adults at risk at risk, they should, in the first place, make the Principal aware of this.

If the concern is about the Principal, they should raise this with the DSL, the deputy DSL(s) or one of the company directors

- Jean Louis Grégoire, Chair of the Board of Directors, [jgregoire@em-normandie.fr](mailto:jgregoire@em-normandie.fr)
- Pierre-Yves Le Corre, [pylecorre@em-normandie.fr](mailto:pylecorre@em-normandie.fr)

We would prefer for members of staff to raise concerns internally in the first instance. However, there may be circumstances in which a member of staff might prefer to raise their concerns outside of the organisation. In such cases, they can contact

- **the NSPCC whistleblowing line on 0800 028 0285**

Our complete Whistleblowing Policy is available at [www.em-normandie.co.uk](http://www.em-normandie.co.uk)



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## Appendix B

### Definitions and Indicators of Abuse

The table below outlines the main categories of abuse as defined by the Department of Health ‘Working Together to Safeguard Children’ document 2018. (Full definitions can be found in this document). All staff should be aware that the possible indicators are not definitive and that some children or adults at risk who may present these behaviours for reasons other than abuse.

The terms ‘person’ or ‘persons’ below, refers to children and adults at risk.

Type of Abuse	Possible Indicators
<p><b>Neglect</b></p> <p>The persistent failure to meet a person’s basic physical and/or psychological needs, likely to result in the serious impairment of the person’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.</p> <p>Neglect may involve a parent or carer failing to</p> <ul style="list-style-type: none"> <li>provide adequate food, clothing and shelter (including exclusion from home or abandonment);</li> <li>protect a person from physical and emotional harm or danger;</li> <li>ensure adequate supervision (including the use of inadequate caregivers); or</li> <li>ensure access to appropriate medical care or treatment.</li> </ul> <p>It may also include neglect of, or unresponsiveness to, a person's basic emotional needs.</p>	<p>Signs that may indicate a person is living in a neglectful situation:</p> <ul style="list-style-type: none"> <li>excessive hunger</li> <li>poor personal hygiene</li> <li>frequent tiredness</li> <li>inadequate clothing</li> <li>frequent lateness or non-attendance at school</li> <li>untreated medical problems</li> <li>not brought</li> <li>poor relationships with peers</li> <li>compulsive stealing and scavenging</li> <li>rocking, hair twisting and thumb sucking</li> <li>running away</li> <li>loss of weight or being constantly underweight (the same applies to weight gain, or being excessively overweight)</li> <li>low self esteem</li> <li>poor dental hygiene</li> </ul>
<p><b>Physical Abuse</b></p> <p>May involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a person. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a person.</p>	<p>Signs that may indicate physical abuse:</p> <ul style="list-style-type: none"> <li>physical signs that do not tally with the given account of occurrence</li> <li>conflicting or unrealistic explanations of causer</li> <li>repeated injuries</li> <li>delay in reporting or seeking medical advice</li> </ul>
<p><b>Sexual Abuse</b></p> <p>Involves forcing or enticing a person to take part in sexual activities, not necessarily involving a high level of violence, whether or not, the person is aware of what is happening.</p>	<p>Signs that may indicate sexual abuse -</p> <ul style="list-style-type: none"> <li>changes in behaviour</li> <li>changes in language</li> <li>changes in social interaction</li> </ul>



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<p>The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.</p> <p>They may also include non-contact activities, such as involving persons in looking at, or in the production of, sexual images, watching sexual activities, encouraging persons to behave in sexually inappropriate ways, or grooming a person in preparation for abuse (including via the internet).</p> <p>Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children or adults at risk.</p>	<ul style="list-style-type: none"> <li>• changes to physical wellbeing</li> </ul> <p><b>Most importantly: there may be no signs at all</b></p>
<p><b>Sexual Exploitation of children (CSE) or vulnerable adults</b></p> <p>Sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or adult at risk into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.</p> <p>The victim may have been sexually exploited even if the sexual activity appears consensual. Sexual exploitation does not always involve physical contact; it can also occur through the use of technology.</p>	<p>Signs that may indicate CSE or CCE:</p> <ul style="list-style-type: none"> <li>• Persistent and unexplainable absences from school</li> <li>• Loss of interest in school and significant decline in performance</li> <li>• Unexplained acquisition of money, clothes, jewellery, or mobile phones</li> <li>• Excessive receipt of texts or phone calls</li> <li>• Using more than one phone</li> <li>• Having hotel cards or keys to unknown places</li> <li>• Being secretive about who they are talking to and where they are going</li> <li>• Relationships with controlling older individuals, unfamiliar people or associating with a gang</li> <li>• Returning home unusually late or staying out all night</li> <li>• Coming home looking dishevelled</li> <li>• Suspicion of physical assault or unexplained injuries</li> <li>• Carrying weapons</li> <li>• Starting or increasing drug or alcohol use, or being found to have large amounts of drugs on them</li> <li>• Using sexual, gang, drug-related or violent language</li> <li>• Becoming isolated from peers or social networks</li> <li>• Self-harm</li> <li>• Significant changes in emotional well-being</li> </ul>
<p><b>Child Criminal Exploitation (CCE)</b></p> <p>Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.</p> <p>Children could be under threat of violence to themselves, friends or family members and they can be coerced into debt, or into carrying weapons or they may do so for protection. Children who are the victims of CCE often commit crimes themselves and</p>	



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<p>their vulnerability is not always recognised, particularly when they are older children.</p> <p>The experiences of boys and girls who are the victims of CCE can differ and the indicators may not be the same. Both groups are at higher risk of sexual exploitation.</p>	<ul style="list-style-type: none"> <li>• Sudden changes in lifestyle</li> <li>• Increasingly disruptive or violent behaviour</li> <li>• Getting into trouble with the police</li> </ul> <p>The indicators can be spotted when speaking to the young person themselves or family/friends</p> <p>If a child or adult at risk has made a disclosure regarding sexual exploitation, or if you think a person may be at risk of being criminally or sexually exploited please contact the <b>police or the Kingfisher Team (children) on 01865 309196 - out of hours calls will divert to Thames Valley Police Referral Centre.</b></p>
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**Domestic Abuse**

Defined as, “any incident or pattern of incidents of controlling, coercive or 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. This can encompass but is not limited to the following types of abuse: psychological, physical, sexual, financial or emotional”.

Children and adults at risk can be victims of domestic abuse in their own intimate relationships or they may see, hear or experience the abuse of others.

**Forced marriage**

A forced marriage (FM) is a marriage conducted without the valid consent of one or both parties and where duress is a factor. Forced marriage is now a specific offence under Section 121 of the Anti-Social Behaviour, Crime and Policing Act 2014.

FM is very different to an arranged marriage where both parties give consent.

**Modern Slavery and Human Trafficking**

Modern slavery can take many forms including the trafficking of people, forced labour, servitude and slavery. Victims can include adults and children and come from all walks of life and backgrounds. A quarter of all victims are children.

The Modern Slavery Act 2015 places a duty on specified public authorities to report details of suspected cases of modern slavery to the National Crime Agency.

Indicators of Modern Slavery can include

- Lack of access to legal documents (e.g. passports)
- Appearance (malnourished, unkempt, etc)
- Untreated or unexplained injuries
- Attitude (withdrawn, frightened, unable to speak for themselves)
- Indebtedness or in a situation of dependence
- Frequent changes of location or restrictions on movement



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### Female Genital Mutilation

Female genital mutilation (FGM), sometimes referred to as female circumcision, refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is illegal in the UK.

There are no health benefits to FGM, it is carried out for cultural and social reasons within families and communities. The procedure is traditionally carried out by an older woman with no medical training. Anaesthetics and antiseptic treatment are not generally used, and the practice is usually carried out using basic tools such as knives, scissors, scalpels, pieces of glass and razor blades.

The Oxford Rose Clinic is a specialised clinic run at the John Radcliffe Hospital to address the health and safeguarding issues associated with FGM. **Women should be referred to this clinic by emailing [oxfordrose.clinic@nhs.net](mailto:oxfordrose.clinic@nhs.net) or calling 01865 222969.**

Healthcare professionals have a duty to safeguard any children or adults at risk who may be at risk of FGM. Information about how to identify children at risk of FGM, including a screening tool and pathways are available on the Oxfordshire Safeguarding Children Board website.

### Self-Harm

Deliberate self-harm is intentional self-poisoning or injury, irrespective of the apparent purpose of the act, ([www.nice.org.uk](http://www.nice.org.uk)). Self-harm is an expression of personal distress, not an illness.

#### Self-harm can involve

- cutting, burning, biting
- head banging and hitting
- picking and scratching
- pulling our hair
- overdosing and self-poisoning
- substance misuse
- taking personal risk
- self-neglect
- disordered eating

#### Indicators of self-harm may include

- changing in eating/sleeping habits
- changes in activity and mood
- increased isolation from friends and family
- talking about self-harming or suicide
- expressing feelings of failure, uselessness or loss of hope
- giving away possessions
- becoming socially withdrawn
- lowering of academic grades
- abusing drugs or alcohol

### Bullying

Bullying is not always easy to recognise as it can take a number of forms. A child or adult at risk may encounter bullying attacks that are

- physical: pushing, kicking, hitting, pinching and other forms of violence or threats



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- verbal: name-calling, sarcasm, spreading rumours, persistent teasing, emotional: excluding (sending to Coventry), tormenting, ridiculing, humiliating

Persistent bullying can result in depression, low self-esteem, shyness, poor academic achievement, isolation, threatened or attempted suicide

Indicators a person is being bullied can be

- coming home with cuts and bruises or torn clothes
- asking for stolen possessions to be replaced
- falling out with previously good friends
- being moody and bad tempered
- wanting to avoid leaving their home
- aggression with younger brothers and sisters
- doing less well at school
- sleep problems or anxiety
- becoming quiet and withdrawn

**Peer on Peer Abuse**

Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children or adults at risk and within relationships of children or adults at risk (both intimate and non-intimate).

Peer-on-peer abuse can take various forms, including serious bullying (including cyber-bullying), relationship abuse, domestic violence, sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or gender-based violence.

**Prevent - Extremism**

The Counterterrorism and Security Act 2015 places a safeguarding duty on settings to have “due regard to the need to prevent people from being drawn into terrorism”.

Settings subject to the Prevent Duty will be expected to demonstrate activity in the following areas

- assessing the risk of persons being drawn into terrorism
- demonstrate that they are protecting children and adults at risk from being drawn into terrorism by having robust safeguarding policies.
- ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board.
- make sure that staff have training that gives them the knowledge and confidence to identify persons at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism
- ensure persons are safe from terrorist and extremist material when accessing the internet in the setting
- preventing adults at risk and children from being drawn into extremism is a safeguarding concern. It is essential that frontline staff are able to spot the signs and make a safeguarding referral.

Indicators may include

- Withdrawing from usual activities
- Accessing extremist literature/websites
- Expressing ‘us and them’ thinking
- Expressing feelings of anger, grievance or injustice



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## Appendix C

### Summary of contact details

EM Normandie UK Safeguarding Lead : Dr Miriam Schmidkonz, Tel 01865 681 408

EM Normandie Deputy Safeguarding Leads : Birgit Muller, Tel 01865 681 412  
Emmanuelle Tameze Aoutsa  
Tel 01865 681 407/406

#### **Immediate concerns about a child or adult at risk**

For example,

- allegations/concerns that the child or adult at risk has been sexually/physically abused
- concerns that the child or adult at risk is suffering from severe neglect or other severe health risks
- concern that a child or adult at risk is living in or will be returned to a situation that may place him/her at immediate risk
- the child or adult at risk is frightened to return home
- the child or adult at risk has been abandoned or parent is absent

**You should call the Multi-Agency Safeguarding Hub (MASH) immediately Tel: 0345 050 7666 or out of office hours 0800 833 408 and inform the EMN DLS or deputy DLS(s) as soon as possible.**

#### **Non immediate concerns about a child or adult at risk**

Please refer to and follow EMN internal processes in the first instance. If this is not possible or not appropriate please call the Locality and Community Support Service (LCSS) Central : 0345 241 2705  
<https://www.oxfordshire.gov.uk/residents/children-education-and-families/childrens-services/integrated-childrens-services/locality-and-community-support>

or contact the Adult Safeguarding Team on 0345 050 7666 for adults at risk.

#### **To report an allegation against a person in a position of trust**

Please refer to and follow EMN internal processes in the first instance. If this is not possible or not appropriate, please contact

a. for concerns regarding children

the **Oxfordshire Local Authority Designated Officer (LADO) on 01865 810603** or email:

[LADO.safeguardingchildren@oxfordshire.gov.uk](mailto:LADO.safeguardingchildren@oxfordshire.gov.uk)

The LADO should be made aware of all cases in which it is alleged that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children



UK

b. for concerns regarding adults at risk

the **Oxfordshire County Council's Safeguarding Adults Team on 01865 328 232**

### **To report an allegation of child sexual exploitation**

Please refer to and follow EMN internal processes in the first instance. If this is not possible or not appropriate Please contact the Kingfisher Team on 01865 309196.  
Out of hours calls will divert to Thames Valley Police Referral Centre.

### **To report an allegation of radicalisation or extremism**

**Call 999 if there is any immediate danger – make safe if possible**

**In non-emergency situations**, please refer to and follow EMN internal processes in the first instance:  
If you have concerns regarding another student or other member of the EMN community who may be at risk of radicalisation, please immediately contact

#### Students

- your Student Life Officer
- your Head of Programme
- the Principal
- any other member of the EM Normandie UK management team in Oxford

#### Members of staff and contract lecturers

- your line manager
- your Head of Programme
- the Principal
- any other member of the EM Normandie UK management team in Oxford

If this is not possible or not appropriate **please contact the national Polices' Prevent Team on 0800 011 3764 or MASH on 0345 050 7666.**



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## Annex 1 - control table

Version	v1	Name	Role	Date
Created by :		Birgit Muller	Office Manager	Aug 2021
Approved by :		Miriam Schmidkonz, Principal		
Version	v2	Name	Role	Date
Amended by :		Birgit Muller	Office Manager	Feb 2023
Changes approved by :		Miriam Schmidkonz, Principal		
Version	v3	Name	Role	Date
Amended by :		Birgit Muller	Office Manager	Aug 2024
Changes approved by :		Miriam Schmidkonz, Principal		
Version	v4	Name	Role	Date
Reviewed by :		Birgit Muller	Office Manager	Aug 2025
		Minor changes to wording, updating of contact information.		
Approved by :		Miriam Schmidkonz, Principal		
Version	V4.2	Name	Role	Date
Reviewed by :		Birgit Muller	Office Manager	Dec 2025
		Under review by OfS		
Changes approved by :		Miriam Schmidkonz, Principal		07 Jan 2026
Version		Name	Role	Date
Reviewed by :				
Changes approved by :				