

To: Scrutiny Committee
Date: 6 December 2016
Report of: Tim Sadler, Executive Director for Community Services
Title of Report: Safeguarding of language school students under 18 years of age

Summary and recommendations	
Purpose of report:	The report will act as a follow up review and summary to questions raised to the Secretary of State for Business, Innovation and Skills by Councillor Dee Sinclair during February 2016 the care of foreign students in Oxford when staying with host families. This report outlines the nature of the safeguarding work undertaken in Oxford City and highlights the partnership practice currently in place.
Key decision:	No
Executive Board Member:	Councillor Dee Sinclair, Board Member for Community Safety
Corporate Priority:	Vibrant, Sustainable Economy Strong, Active Communities
Policy Framework:	Safeguarding Children & Vulnerable Adults Policy

Appendices	
Appendix 1	OSCB / Oxfordshire County Council - Policy and Expectation on the care of international students under the age of 18 – March 2014
Appendix 2	Oxfordshire County Council – Schools Annual Safeguarding Report template – August 2015

Introduction and background

1. Oxford benefits, both financially and culturally, from the arrival of foreign students who come to study English in one of the 40+ language schools operating in Oxford. The popularity of these programmes results in thousands of residential or day excursion students visiting Oxford, with an annual peak between June and September of Oxford-based summer schools.
2. Summer school residential stays typically last for three weeks and the size of the schools' intake varies from 50 to 900 students per week, with some students as young as 12. A sizeable proportion of under-18 year-olds will be placed in Homestays during their summer school visit.

The Oxford Language School Forum

3. In response to Thames Valley Police concerns about the increase in robberies of summer school language school students, Oxford Safer Communities Partnership (OSCP) set-up the Oxford Language School Forum (OLSF) in summer 2012. The OLSF works closely with language schools to improve the quality of life for visiting students and residents of Oxford who may be impacted by the arrival of language school students.
4. The OLSF has increased its membership year on year. The largest language schools are members of the forum and provide a key link to agencies that receive service requests due to language school students.
5. The four OLSF priorities in 2012 were:
 - Vulnerability of students
 - Alcohol consumption and litter in parks
 - Late night noise and low level Anti-Social Behaviour (ASB)
 - Crowding public places and public transport
6. Whilst the defined actions worked on by OLSF each year have altered based upon emerging locality based issues, the overarching priorities have remained broadly the same. The main addition to the initial priorities set is that of a distinct safeguarding priority.

Safeguarding responsibilities of language school students

7. During 2014 the Oxfordshire County Council Safeguarding Team became a member of the OLSF. This arrangement recognised the need to link the work and discussions of OSCB (Oxfordshire Safeguarding Children Board) with that of the OLSF.
8. In early 2014 OLSF language schools were asked by Oxfordshire County Council Safeguarding Team to assist in shaping their 'Policy and Expectation on the Care of International Students under the age of 18'. This policy and guidance was in response to the requirements of 'Working Together to Safeguard Children 2013', the UK Council for International Student Affairs Guidance "International students under 18: guidance and good practice" and 'Safeguarding Children and Safer Recruitment in Education 2007'.

9. The Policy was adopted in 2014 and provides guidance for all professionals working in schools or colleges where any foreign student under the age of 18 is registered. In summer 2015 Oxfordshire County Council Safeguarding Team reiterated the need for language schools to provide a submission towards the County Council Schools Annual Safeguarding Report.
10. In February 2016 Oxford City Councillor Dee Sinclair raised questions to the Home Office regarding the care of foreign language students in Oxford when staying with host families. The response from Nicky Morgan MP provided assurances that there are arrangements currently in place to ensure the safety of students when placed with host families. It recognised a point discussed within OLSF about the differentiation between students hosted in a placement for 28 days or more where the child is under 16 years of age. This type of accommodation is classed as private fostering and the placement must be reported to the relevant Local Authority. Other arrangements that do not fit this category could also fall within the scope of regulated activity, if, for instance the host families are paid to provide the accommodation irrespective of the length of time of the placement.

Safeguarding risk areas

11. In 2015 the OLSF conducted consultation with its membership to identify specific potential safeguarding risks. These can broadly classified as:
 - Student health service demands
 - Operational risks highlighted regarding the high number of admissions of students to John Radcliffe Hospital Emergency Department for inappropriate minor ailments
 - Students at school
 - Identified need for OLSF to engage with language school hosting venues and raise awareness of safeguarding responsibilities
 - Students in Homestays
 - Appropriate mechanisms in place to ensure a student's Homestay accommodation is adequate and reporting processes understood.
 - Students in the community
 - Review safe locations for language school students to present themselves to if requiring assistance
 - Prevention of students becoming victims of robbery and other crimes
 - Risks associated with underage students purchasing alcoholic beverages from off licenses
 - Reporting of safeguarding issues
 - Embedding partnership arrangements for safeguarding issues highlighted at OLSF meetings to be raised with Oxfordshire County Council Safeguarding Team
 - OLSF assistance in raising awareness amongst Oxford language schools of the need to provide submissions for the Oxfordshire Council Annual Safeguarding report for teaching establishments

OSLF Actions in support of Oxfordshire County Council Safeguarding Team

12. During 2015 the OLSF set a series of actions to address the range of safeguarding related concerns identified by the partnership. These actions were as follows:

- Thames Valley Police Crime Prevention Advisor reviewed the list of Oxford 'Safe Places' in response to feedback from a selection of language school students. The scheme has been further developed in 2016.
- An extension of the operational capacity of Thames Valley Police 'Operation Buzzard'; a student robbery prevention and safeguarding initiative.
- Summer 2015 Test Purchase (TP) licensing operations undertaken in St Clements and East Oxford using EF language school students.
- 'Operation Brush' in South Park and Headington Hill Park comprising police patrols in the parks on late shifts. Police officers and PSCOs would engage with language school students, assess welfare and remove alcohol if students were underage. If required the relevant language school was contacted for follow up work with the student.
- An OLSF subgroup was created and action plan developed to address high numbers of language students inappropriately presenting at the JR11 Emergency Department for minor injuries.
- A sub group of OLSF was created to map language student teaching and accommodation venues in Oxford together with providing briefings on venues safeguarding requirements and responsibilities.
- The chair of OLSF made contact with and invited the Oxfordshire LADO (Local Authority Designated Officer) for Safeguarding to become a standing member of OLSF. This invitation was accepted and LADO presence at meetings became standard practice. This led to increased awareness of schools and colleges of their obligation to comply with OCSB requirement for information about safeguarding arrangements (Section 10 and 11 of Children's Act 2004).

13. Unrelated to the work of OLSF but as a result of recommendations by OCSB it was a compulsory duty for all Oxford City Council staff to have undertaken specific children safeguarding training. The rollout of this training was undertaken through 2015 and involved a selection of online and class based training. Staff completion of this training was monitored by City Council line managers and Human Resources.

14. The emergency contact details of language schools who are OLSF members were collated and held by the Thames Valley Police Crime Prevention Advisor, Police Detective Sergeant leading Operation Buzzard, and Operation Managers for both Oxford Bus Company and Stagecoach Oxfordshire. These details are used when students are in difficulty and the relevant school needed to be notified.

On-going language school student safeguarding challenges

15. Due to differing approaches by language schools there remains a lack of clarity of the mechanisms that language students can use to report their experiences – i.e. reporting of welfare issues / homestay quality issues etc.

16. 'Pop Up' language schools appear each summer in Oxford. Whilst the majority of students studying in Oxford appear to be via schools actually based in Oxford there remains a quantity of students who study at schools with no Oxford base. It has been difficult to identify and engage with these schools. The OSLF don't know the number of these language students studying in Oxford or where they live and study.
17. Legislation – In light of the exchange of correspondence during February and March 2016 between Dee Sinclair City Council Portfolio Holder for Community Safety, Andrew Smith MP for Oxford East, and the Secretary of State for Business, Innovation and Skills there remains concern that whilst there is legislation to protect language school students the legislation is not as robust as could be.
18. The OSLF believe that legislation should be introduced in relation to the placement of students under the age of 16. Instead of requiring the student to reside at a property for 28 days prior to notification to the designated Local Authority, it is suggested that there should be a requirement for the designated Local Authority to be notified immediately when a child under 16 years of age is hosted.

Conclusion

19. The work of the Oxford Language School Forum is wide ranging and inclusive. It has focussed on safeguarding language school children and through its work with Oxfordshire County Council's Local Area Designated Officer. Adherence by language schools to their statutory safeguarding requirements is monitored by the LADO; the OSLF has used its strong partnership approach to deliver crime prevention and safeguarding support activities.
20. The OSLF will continue to address the issue of 'Pop-Up' school safeguarding requirements and improved access for students in reporting their experiences.

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