

# Safeguarding: The Protection of Children and Vulnerable Adults

Guidance for OCR staff and assessors



# Contents

Introduction . . . . .	2
Safeguarding Policy Statement . . . . .	3
Scope & Definitions . . . . .	4
Code of Conduct . . . . .	6
Safeguarding Third-Parties . . . . .	8
Dealing with Concerns or Disclosures . . . . .	11
Script or Coursework . . . . .	12
Telephone Call . . . . .	13
Inappropriate Activities at a Centre . . . . .	14
The Actions or Comments of a Colleague . . . . .	15
Responding to a Direct Disclosure . . . . .	16
Taking & Using Images . . . . .	17
The Role of the OCR Safeguarding Officer . . . . .	18
Contacting the OCR Safeguarding Officer . . . . .	20

# Introduction

Each year Oxford, Cambridge & RSA Examinations (OCR) has contact with a huge number of children and adults through its examination system. Unfortunately a few of these contacts will cause concern about the physical, mental or emotional wellbeing of an individual.

OCR recognises its legal and ethical responsibility to protect children and other vulnerable people that the organisation and its Representatives come into contact with. This includes helping to protect them from the possibility of abuse and taking appropriate action when we become aware of cases of suspected abuse.

This document outlines the policy and guidance adopted by OCR to ensure individuals can enjoy and benefit from their learning and assessment with the minimum risk of a safeguarding issue arising.

In matters of safeguarding the safety and welfare of the child or vulnerable person is always the paramount consideration.

# Safeguarding Policy Statement

Keeping children and vulnerable people safe is everyone's responsibility. In all aspects of our activities, the needs and interests of children and vulnerable groups must be put first.

In adopting this policy OCR recognises the following basic rights of the child, young person or vulnerable adult:

- to be given the support required to be healthy, stay safe, enjoy and achieve through learning, make a positive contribution to society and achieve economic well-being
- have equal rights to protection from abuse and exploitation
- expect the support of all adults in their needs for care and protection from harm or abuse
- be able to study for and obtain qualifications without fear of abuse, harm or neglect

In trying to help deliver these rights OCR will:

- respect and promote the rights, wishes and feelings of children and vulnerable adults
- implement and promote appropriate procedures to safeguard the well-being of children and vulnerable adults and protect them from abuse
- recruit, train, support and supervise its employees and Representatives to adopt best practice to safeguard and protect children and vulnerable adults
- require employees and Representatives to adopt the Policy and Guidance outlined in this document
- respond to any allegations of misconduct or abuse of children or vulnerable adults in line with this Policy and Guidance as well as implementing, where appropriate, the relevant disciplinary and appeals procedures

- review and evaluate this Policy and Guidance on a regular basis – either in line with legislative requirements, after an issue relating to the application of this guidance, or otherwise annually

## Scope & Definitions

### Scope

This policy applies to all Representatives of OCR in relation to all the organisation's activities and assessments.

For the purposes of this policy, and its enforcement, a Representative is defined as any permanent or temporary member of staff, any assessor or any other person whose activities and/or reason for coming into contact with vulnerable groups is substantively defined or controlled by OCR.

Although OCR has a contractual agreement with Examination Centres to provide assessment and other products and services, this in no way negates the primary responsibility of the Head of Centre to assess the risks to their candidates and to ensure that appropriate safeguarding measures are in place in their centre.

### Definitions

For the purposes of this policy, and its enforcement, the following terms used in this document are defined as follows:

**Child** – a child or young person is defined as a person below the age of eighteen years, as set out in the United Nations Convention on the Rights of the Child and the UK Government guidance on Safeguarding Children and Safer Recruitment in Education.

**Vulnerable Adult** – a vulnerable adult is defined in Section 59 of the Safeguarding Vulnerable Groups Act as a person aged 18 or over who:

- is living in residential accommodation, such as a care home or a residential special school
- is living in sheltered housing

- is receiving domiciliary care in his or her own home;
- is receiving any form of health care
- is detained in a prison, remand centre, young offender institution, secure training centre or attendance centre or under the powers of the Immigration and Asylum Act 1999
- is in contact with probation services
- is receiving a welfare service of a description to be prescribed in regulations
- is receiving a service or participating in an activity which is specifically targeted at people with age-related needs, disabilities or prescribed physical or mental health conditions or expectant or nursing mothers living in residential care (age-related needs includes needs associated with frailty, illness, disability or mental capacity)
- is receiving direct payments from a local authority/HSS body in lieu of social care services
- requires assistance in the conduct of his or her own affairs

**Abuse** – Abuse may be specific mistreatment or neglect of a child or vulnerable person. Somebody may abuse a child or vulnerable person by inflicting harm, or by failing to act to prevent harm. Children and vulnerable persons may be abused by an adult or adults, or by a child or children.

Abuse and exploitation may result from single or multiple acts of sexual exploitation, physical abuse, emotional abuse, neglect, harm from bad practice or undue pressure that affects the child or vulnerable person's independence or personal development.

**Safeguarding** – the act of putting policies, procedures, training and appropriate people in place to minimise the possibility of abuse and to deal appropriately with abuse if it occurs.

**OCR Representative** - any permanent or temporary member of staff, any assessor or any other person who's activities and/or reason for coming into contact with

vulnerable groups is substantively defined or controlled by OCR.

**Radicalisation** – the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

## Code of Conduct

All OCR Representatives are expected to uphold the highest levels of professional conduct in their dealings with children, young people or vulnerable adults.

This includes not only avoiding any physical, verbal or other conduct that could be construed as abusive, but also by not placing themselves in situations where they are open to false allegations and by protecting vulnerable individuals from possible abuse by others.

Generally OCR Representatives should make a conscious effort to appear friendly, open-minded and relaxed, without becoming too familiar.

When in direct contact with children, young people or vulnerable adults they must:

- give candidates as much encouragement as possible
- adopt a relaxed, informal and friendly manner
- listen to what candidates say
- keep a physical and professional distance
- be aware of the effect that your words and actions may have
- be approachable
- appear alert, co-operative and open-minded
- always work in an open environment, avoiding private or unobserved situations and encouraging an open environment for activities
- treat all children and vulnerable adults equally, with respect and dignity

OCR Representatives should never:

- stray from the task in the specification
- be unnecessarily inquisitive – do not ask for personal details that are not necessary for completion of the assessment
- do or say anything that might make a candidate feel uncomfortable
- say things that could be interpreted as aggressive, hostile or impatient
- be drawn into personal conversations or introduce personal subjects
- make comments that could be misinterpreted, such as about an individual's appearance
- sit or stand too close to the candidate
- stand over the candidate as this may make them feel pressured
- meet a candidate other than in the agreed assessment venue
- exchange personal contact details
- arrange assessments at times that fall outside the normal timetable parameters of the department/institution
- allow children or vulnerable adults to swear or use sexualised language unchallenged
- allow children or vulnerable adults to use language that aims to radicalise by supporting terrorism and forms of extremism leading to terrorism.

## Safeguarding Third-Parties

Some OCR specifications involve candidates in interaction with other children, particularly in media or child care related subjects. In these instances OCR will adopt the following guidance to ensure risk of harm to the third-party child, or vulnerable adult, is minimised.

**Specifications including a study of  
Child Development and Social Care**



- All courses involving the study of child development or social care must be conducted in accordance with the guidelines given in the specification.
- The confidentiality of the child or vulnerable adult who is the subject of the study is of the utmost importance. The information collected by the candidate must be deemed as confidential and any photographic evidence must be kept securely.
- The candidate, who may be a minor themselves, needs to be protected when carrying out visits to homes or care facilities. They should not normally be left alone with a child or vulnerable adult, even when the candidate already has personal contact with the subject, such as studying the child of a family friend.
- The centres should be aware of, and have a record of, the location of any visits undertaken by the candidate.
- Senior Management in Centres must be aware of their particular responsibilities in the conduct of Child Development and Social Care studies. In particular their duty of care to their candidates and children or vulnerable adults that are the subject of a study.
- The OCR Representative must take particular care of any materials, especially photographic or video materials so that no unauthorised person gains access to them. Any materials, whether written or photographic, must be returned to the Centre once moderation is over, unless required for training purposes.
- Unless a Parental Consent Form has been received by OCR, any photographic evidence must be removed from training materials, as should any written material relating to the child being studied so that confidentiality is safeguarded.

### **Selection of Appropriate Material and Content of Portfolios**

- Some specifications require the study of texts, images or other media that are selected by the Centre. Care should be taken when selecting such media to ensure

that their content is appropriate to the cohort being taught.

- Any text or other media chosen by the Centre which may be considered controversial in some way should be discussed with the Senior Management Team in the Centre prior to use.
- Particular care must be given to texts, images or other media that are or could be inferred to be:
  - gratuitously offensive in language
  - sexually explicit
  - leading to discussions about sexual relationships
  - containing nudity or representations of sexual acts
  - promoting illegality or criminal behaviour
  - violent
  - describing or promoting abuse
  - describing or promoting the support of terrorism and inciting radicalisation
  - describing or promoting inequality or inhumanity
- When making their consideration of materials to be used, Centres should take into account the appropriateness of any texts, images or other media in relation to: the age of the candidates; the context of the material, current legal guidelines, the intended audience and the potential to offend a wider audience.
- Senior Management within the Centre should consider whether it is appropriate to arrange a consultation with parents before candidates use materials for performance which could be shocking and offensive.
- Consideration should be given to the choice of materials selected by the candidate for use in portfolios and its acceptability, or appropriateness to the work in hand.

### **Use of Pictorial/Recorded Evidence**

The following guidelines apply to all recording media including, but not limited to, photographs, video and sound recording.

- In general no individual should be recorded in any way without their prior knowledge and consent, or the consent of their parent, guardian or personal advocate.

- Where the subject of the study is a child or vulnerable person, specific written consent must be obtained from the parent, guardian or personal advocate prior to any recording. The consenting person must be made aware of how the recordings will be used and who will have access to them.
- Parents and candidates should be informed that recorded evidence may be used for training as well as assessment purposes. If OCR wishes to use recordings for training, written permission must be sought by OCR.
- Careful consideration should be given to what requirement is met, or additional evidence provided, by the recording. Only activities that directly fulfil those requirements should be recorded.
- All recordings must be considered as confidential, and any portfolio or work that includes those recordings must then also take on a confidential status. Access to the recordings or work containing them must be restricted only to those that have a legitimate reason to see them.
- Recordings must never be placed on the Internet, included in e-mails which might be forwarded to unauthorised persons, or otherwise be made publically available.
- When accessing images or recordings on OCR secure portals for assessment purposes these must not be copied and/or distributed at any time.

## Dealing with Concerns or Disclosures

There can be a range of possible ways in which a concern might arise during your activities. This might arise from one of several circumstances, some of which are listed here:

- student-teacher relationship
- student-other adult relationship

- abuse at home
- indications of self-harm
- behaviour between older and younger students
- behaviour of fellow examiner

All allegations or suspicions of abuse must be taken seriously and treated in accordance with safeguarding procedures.

Things to look out for as signs of a possible issue include:

- threats or accounts, direct or inferred, of self-inflicted harm
- threats or accounts, direct or inferred, of harm to others
- indications that the individual is being physically, sexually or emotionally threatened or harmed by others
- indications that the mental state of the individual may be impaired
- indications that the individual is being bullied or taken advantage of
- use of indecent or violent images
- indications that individual(s) are being radicalised or aiming to radicalise others. Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

These signs could take the form of answers to questions, other narrative on a question paper, graphic drawings, e-mails or any other form of correspondence. References to previous incidents or experiences, as well as immediate issues, should be highlighted to an OCR Safeguarding Officer.

Events that would not normally constitute a Safeguarding issue unless other signs are present are:

- a failure to answer any questions in an examination
- isolated uses of indecent language
- generic doodles

## **Concerns or Disclosures Arising from a Script or Coursework**

If the concern arises as the result of any **written communication** the course of action should be the same.

1. Do NOT contact the candidate or try to intervene yourself
2. Refer the documentation to one of the OCR Safeguarding Officers (see contact details on page 19) in one of the following ways:
  - If it is an examination script, copy the front cover and all pages that contain material of concern. Send these, where possible by registered post, and a covering note to one of the OCR Safeguarding Officers, clearly marked 'Private & Confidential'.
  - For other hardcopy documents send a photocopy of the material and a covering note to one of the OCR Safeguarding Officers, clearly marked 'Private & Confidential'.
  - For RM™ Assessor scripts flag the item using the 'material of concern' option.
  - For e-mails forward the e-mail to one of the OCR Child Protection Officers putting the words 'Safeguarding Concern' in the subject line.
3. In all cases the original document should be allowed to continue through the current process, to be dealt with as normal.
4. The Safeguarding Officer will log the issue on the Safeguarding Log and refer it to an appropriate authority – usually the Centre.
5. If you have a more immediate issue or would like further advice please contact one of the Safeguarding Officers by telephone (see contact details at the end of this document).

## **Concerns or Disclosures Arising from a Telephone Call**

If the concern arises as the result of a **telephone conversation** your course of action should be as follows:

1. Stay calm and clear in your communication – do not show an overly emotional response.
2. Write down all the details that you can – in particular the caller's full name, his/her Centre name, the time and date of the call and details of any threats or allegations made. Only record what the caller is telling you and do not push the caller for more details.
3. Ask the caller for some contact details and write down whatever they are willing to give you.
4. Calmly express your concern for the caller and ask if they have a trusted person close by that they can talk to – a parent, guardian, teacher, other family member, doctor, long-time friend of the family etc. Encourage them to go and talk to this person as soon as they can after the call ends.

A suitable phrase would be something like,

“I am concerned about what you are telling me and I think it would be helpful for you to talk to somebody. Do you have a parent or teacher close by that you can talk to?”

5. Ask the caller if they would like details of how they can contact somebody that can help them. Give them the following contact details if they want them:

**Childline - 0800 1111**

**Child Exploitation & Online Protection Agency (CEOP)**

Go to the web site **thinkuknow.co.uk** and use the 'Click CEOP' button to report an issue

6. Tell the caller that because of your concerns you will be referring the case to an OCR Safeguarding Officer.
7. During the call **DO NOT** do any of the following:
  - o ask the caller for details other than those which they volunteer

- give the caller your personal or contact details, other than your name
  - promise to take actions that you cannot guarantee to fulfil
  - promise to keep the issue secret
8. Immediately following the call e-mail all the details to both OCR Safeguarding Officers putting the words 'Safeguarding Concern' in the subject line.

### **Concerns or Disclosures Arising From Inappropriate Activities at Centres**

On occasions, a child protection concern at a centre may arise out of an activity that you are observing. Two possible contexts for this are drama performance and discussions you are observing. If an activity you are watching gives you cause for concern, you will need to consider whether to stop the assessment prior to completion. No activity should continue that might be seen as raising safeguarding issues, or putting anyone at risk of harm or abuse.

3. If you are concerned about an activity, you should seek advice immediately, by contacting one of the OCR Safeguarding Officer by phone (see contact details at the end of this document).

If there is no answer, contact the main switchboard on 01223 553311 and explain that you need to make contact with one of the Safeguarding Officer.

As soon as possible you should send a written account by mail or e-mail to one of the Safeguarding Officers.

### **Concerns Arising from the Actions or Comments of a Colleague**

Any allegation of abuse or suspected abuse in relation to a colleague acting as an OCR Representative must be referred to an OCR Safeguarding Officer for discussion and guidance.

The matter will be dealt with in accordance with the OCR's Safeguarding and/or whistleblowing/disciplinary procedures.

This section applies as much to out-of-hours activities as it does to activities that take place within the regular working day. It also applies to concerns about professionals who might abuse in their private lives as, in such situations, careful consideration would need to take place about whether the employee or OCR Representative presents a risk in the work context.

If a concern arises during a visit to a Centre where the colleague is in direct contact with children, these contacts need to be made:

- With the Head of Centre and/or the Centre's Safeguarding Officer
- With the OCR Safeguarding Officer

## Responding to a Direct Disclosure

If you find yourself in a situation where an individual discloses information directly to you it is important to listen carefully to the information the child or vulnerable adult is giving you. When listening to a disclosure the following good practice is required:

- react calmly so as not to frighten the child/vulnerable adult
- listen to the child/vulnerable adult
- do not show disbelief
- tell the child/vulnerable adult that he/she is not to blame and that he/she was right to tell
- take what the child/vulnerable adult says seriously, recognising the difficulties inherent in interpreting what a child/vulnerable adult says, especially if they have a speech disability and/or differences in language
- do not pre-suppose that the experience was bad or painful - it may have been neutral or even pleasurable
- always avoid projecting your own reactions onto the child or vulnerable adult



- if you need to clarify, keep questions to the absolute minimum to ensure a clear and accurate understanding of what has been said
- if you need to clarify or the statement is ambiguous, use open-ended, non-leading questions
- do not introduce personal information from either your own experiences or those of other children or vulnerable adults
- reassure the child or vulnerable adult

When receiving a disclosure you should avoid the following:

- panic
- showing shock or distaste
- probing for more information than is offered
- speculating or making assumptions
- making negative comments about the person against whom the allegation has been made
- approaching the individual against whom the allegation has been made
- making promises or agreeing to keep secrets.
- giving a guarantee of confidentiality

## Taking & Using Images

Due to the nature of its business OCR uses a lot of images, and sometimes video, of children and young adults. In order to ensure any child or vulnerable person is protected the following guidelines must be followed:

- Wherever possible the required images should be purchased from a recognised commercial image bank,

such as istockphotos.com, who will have already obtained the necessary permissions for their images to be used.

- When an OCR Representative needs to take photographs of children or vulnerable groups at an event, the OCR Representative must ask permission of the event organiser.
- When an OCR Representative needs to take photographs of children or vulnerable groups at an off-site location, for example in a centre, the OCR Representative must ask permission of the senior staff at the location, for example the Head of Centre.
- In all cases, where possible consent should be sought from the parent, guardian or advocate of any child or vulnerable person prior to any photographing, videoing and/or filming.
- The reason for and possible uses of any images/video must be explained to the person giving permission.
- No OCR Representative should ever take photographs or video of a child or vulnerable adult on a one-to-one basis and/or in a private/unsupervised environment.
- Any photographs or video that is not selected for current or future use by OCR should be deleted as soon as possible after the event.
- Where an OCR Representative takes photographs or video of their own relatives or friends permission for use cannot be inferred, and a written letter of consent is required from the parent, guardian or advocate.
- If any person has concerns about the use of photographs or images of children or vulnerable adults they should refer their concern to the OCR Safeguarding Officers as soon as possible.

## The Role of the OCR Safeguarding Officer

OCR's Safeguarding Officers will:

- maintain appropriate confidential records of any safeguarding incident and resulting actions taken

- promote safeguarding as an important issue throughout the organisation
- make decisions relating to safeguarding about the disclosure of sensitive information to other agencies or interested parties
- take responsibility for reporting numbers of cases to the regulator on an annual basis or as required
- implement and promote a Safeguarding Policy and Procedures, and review them regularly
- keep abreast of developments and understand the latest information on data protection, confidentiality and other legal issues that impact on the protection of children and vulnerable adults
- encourage good practice and support of procedures to protect children and vulnerable adults

# Contacting the OCR Safeguarding Officers

OCR has three Safeguarding Officers whose contact details are as follows:

## **Niki Polydorou**

Head of Risk and Compliance

1 Hills Road  
Cambridge  
CB1 2EU

Email: [niki.polydorou@ocr.org.uk](mailto:niki.polydorou@ocr.org.uk)

Tel: 01223 553789

Mobile: 07738 026998

## **Katharine Dytor**

Complaints Manager

1 Hills Road  
Cambridge  
CB1 2EU

Email: [katharine.dytor@ocr.org.uk](mailto:katharine.dytor@ocr.org.uk)

Tel: 01223 552793

## **Stuart Ross**

Special Requirements Manager

1 Hills Road  
Cambridge  
CB1 2EU

Email: [stuart.ross@ocr.org.uk](mailto:stuart.ross@ocr.org.uk)

Tel: 01223 556595