

SAFEGUARDING CHILDREN AND ADULTS AT RISK POLICY



BRITISH STUDY CENTRES
School of English

Aim	<p>BSC Group Limited (the 'Company', 'We'), including its subsidiaries British Study Centres Limited, Experience English Limited and British Study Centres Teacher Training Limited aim:</p> <ul style="list-style-type: none"> ▪ To ensure that all students aged under 18 are protected from potential abuse from hosts, BSC team members and other suppliers and fellow students. ▪ To inform British Study Centres team members of their responsibilities when working with children and adults at risk (England and Wales) and children and protected adults (Scotland) in order that the BSC team can implement this policy using the guidelines provided. This will protect the safety and well-being of children attending courses and the BSC team employed to work on courses at BSC language schools and residential centres. ▪ To offer a variety of social activities of interest to the needs of younger students ▪ To practice our commitment to safe recruitment, selection and vetting of employees, contractors, workers and volunteers, accommodation providers and other suppliers. ▪ To ensure that all the BSC team are aware if any student is under 18 and that the BSC team are also aware of any consequent special procedure(s) which are applicable.
Purpose	<p>The BSC Group is committed to safeguarding and promoting the welfare of children and young people and expects all members of the BSC team to share this commitment.</p>
Scope	<p>This policy includes all information around safeguarding for all employees, agency workers, contractors, volunteers and internships.</p>
Review date	<p>September 2020</p> <p>The Company reserves the right to modify any part of this policy at its discretion and in accordance with any required legislation changes. We are committed to actively consulting with our employees, and any changes will be communicated, and will apply to both existing and new employees.</p>
Owner	<p>Our Group Safeguarding Manager has overall responsibility for this policy, please contact your local DSL (in England)/ DCPO (in Scotland)/ DLP (in Ireland) for further information about this policy if necessary.</p>

CONTENTS

1. Introduction
2. Definitions
3. Child Safeguarding Procedures
4. Our Responsibilities
5. Searching, Screening and Confiscation
6. Allegations of Abuse or Inappropriate Behaviour involving the BSC team
7. Allegations of Abuse or Inappropriate Behaviour involving Students
8. Whistle-blowing Policy
9. Recording Information

Appendix A: Code of Conduct – Good Practice for the BSC team

Appendix B: Code of Behaviour for Children & Adults at Risk

Appendix C: Recognising Abuse (Primary and Secondary)

Appendix D: Local Safeguarding Policy

Appendix E: Safeguarding Induction Checklist

1. INTRODUCTION

British Study Centres (BSC) firmly believe in having detailed and rigorous control measures in place to safeguard children and adults at risk (England and Wales)/ protected adults (Scotland). At BSC we are committed to safeguarding and we expect everyone who works in our schools to share this commitment.

Our policies aim to follow relevant legislation and guidelines which includes:

- The Education Act (2002) Section 175
- The Children Act (1989 and amendments) and The Children Act 2004
- Sexual Offences Act 2003
- Aimsafer: A Framework for Safeguarding Children & Young People in Higher Education Institutions 2005
- Safeguarding Vulnerable Groups 2006
- Protection of Freedoms Act 2012
- National Minimum Standards for Private Fostering
- Counter-Terrorism & Security Act 2015
- Sexting in schools and colleges (UKCCIS) – August 2016
- Serious Crime Act 2015 (Commencement No 6) Regulations 2017
- Children & Social Work Act 2017
- Working Together to Safeguard Children (Revised 2018)
- Searching, screening and confiscation (January 2018)
- Sexual Violence and Sexual Harassment (May 2018)
- Information Sharing 2018
- Keeping Children in Education Safe (Due to be updated September 2019)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811513/DRAFT_Keeping_children_safe_in_education_2019.pdf

BSC believes that children/young people have rights as individuals and should be treated with dignity and respect. BSC will strive to provide a safe and caring environment for any young person (under 18) and adults at risk (England and Wales)/ protected adults (Scotland) in its care while they are studying at BSC, visiting BSC or participating in BSC activities.

A caring environment is one in which and where:

- The health, safety and welfare of young people has been assessed and catered for.
- The BSC team are alive to the possibility of abuse and take measures to prevent that possibility.
- There is a sound and known reporting system for any incident

This policy and procedures are based on the following principles:

- The welfare of young people and adults at risk (England and Wales)/ protected adults (Scotland) is of primary concern.
- All young people and adults at risk (England and Wales)/ protected adults (Scotland), whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identify have the right to safeguarding from abuse.
- It is everyone's responsibility to report any concerns about abuse to the Designated Safeguarding Lead (DSL – England and Wales), Designated Child Protection Officer (DCPO - Scotland), Designated Liaison Person (DLP– Ireland), and the responsibility of the Social Services Department and the Police to conduct, where appropriate a joint investigation.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
- BSC has a duty to refer to the appropriate person any person who has
 - Harmed or poses a risk of harm to a child;
 - Satisfied the 'harm test' (i.e. no action or inaction occurred but the present risk that it could be significant); or
 - Received a caution or conviction for a relevant offence.
- BSC will foster a culture where safeguarding is taken seriously through regular team training and commitment to safeguarding procedures.

2. DEFINITIONS

Safeguarding

Safeguarding is the process by which we protect children and adults at risk (England and Wales)/ protected adults (Scotland) health, wellbeing and human rights, enabling them to live free from harm.

Children

The Children Act 1989 states the legal definition of a child is “a person under the age of 18”. (The Children Act 1989 and the Vetting and Barring Scheme 2009).

Adults at Risk

Section 115(4) of the Police Act 1997 states that a person can be considered to be vulnerable if they are “substantially dependent upon others in performing basic physical functions, or his ability to communicate with those providing services, or to communicate with others, is severely impaired, and, as a result, he would be incapable of protecting himself from assault or other physical abuse, or there is a potential danger that his will or moral well-being may be subverted or overpowered”.

BSC recognises that although our customers are not considered as vulnerable adults within the terms of the definition but may be considered adults at risk due to vulnerabilities e.g. travelling for the first time, communication difficulties because of the limited English, isolation from friends and family. Therefore we will ensure that the BSC team should take care to ensure appropriate clarity in communication with all customers, grading their language as and when necessary.

Definition of Abuse

Abuse is any behaviour towards a person that deliberately or unknowingly causes harm, endangers life or violates their rights. Abuse may be:

- Physical
- Sexual
- Psychological – repeatedly being made to feel unhappy, humiliated, afraid or devalued by others
- Financial or material – stealing or denying access to money or possessions
- Neglect
- Discriminatory – abuse motivated by discriminatory attitudes towards race, religion, gender, disability or cultural background

Abuse may involve one or a combination of these factors. Please see Appendix C Recognising Abuse and secondary forms of abuse.

Types of Abuse and Neglect can also be found in “Keeping Children Safe in Education (revised September 2019).

3. SAFEGUARDING PROCEDURES

Where under 18s are concerned there are statutory responsibilities for any organisation to follow regarding the safety of young people.

Each of the BSC centres has a Designated Safeguarding Lead (DSL)/Designate Child Protection Officer (DCPO) in Scotland/Designated Liaison Person (DLP) in Ireland to be the lead person with regard to safeguarding issues.

All members of the BSC team working closely with under 18s have to be alert to possibilities of abuse and any concerns about the behaviour of any adult with respect to that student should be reported to the DSL/DCPO/DLP who will decide what further action to take. Guidance will be available in each school with the appropriate reporting documentation available (see Local Safeguarding Policy – Appendix D)

It is the duty of the BSC team to inform only not to investigate – this is the role of the Police and Social Services.

If the team, in the course of their work at BSC, have a safeguarding issue brought to their notice, this must be treated as a priority over all other work.

Guidance with regard to a specific incident may be obtained from the DSL/DCPO/DLP. All schools must contact the DSL/DCPO/DLP, their Deputy, or the Student Experience Manager, if they have any cause to believe the student or young person involved in any activity in BSC, covered by this policy is in any way at risk. The DSL/DCPO/DLP, their Deputy, or the Student Experience Manager, will follow the relevant procedures.

A written report should be provided to the DSL/DCPO/DLP who will keep a confidential record of any such incidents.

Records will be kept of all such incidents and their outcomes and held by the DSL/DCPO/DLP in accordance with the Data Protection Act 2018 and GDPR.

All of the BSC team should be aware that in accordance with statutory requirements where safeguarding issues are involved, it is not possible to offer confidentiality to any person regardless of age as any disclosures must be reported.

4. OUR RESPONSIBILITIES

The Student Experience Manager (SEM) has responsibility for the oversight of the school's Safeguarding Children and Adults at Risk Policy with delegated responsibility to relevant members of the team. Each school has a senior member of the team who is tasked with the Designated Safeguarding Lead responsibilities within the school and will liaise directly with the SEM as deemed necessary.

All class registers will indicate any students who are under 18 in order that teachers are able to inform the DSL/DCPO/DLP or their deputy immediately of any absences of any student under 18.

4.1 ROLE OF THE DESIGNATED SAFEGUARDING LEAD (ENGLAND AND WALES)/DESIGNATED CHILD PROTECTION OFFICER (SCOTLAND)/DESIGNATED LIAISON PERSON (IRELAND) (AND DEPUTY IN THEIR ABSENCE)

The Designated Safeguarding Lead (DSL) and deputy will have Specialist Safeguarding for Safeguarding Lead training (formerly known as Level 3) The Designated Child Protection Officer (DCPO) in Scotland and Designated Liaison Person (DLP) in Ireland, will have the equivalent appropriate training.

The role of the DSL/DCPO/DLP is:

- To receive information about events that are planned in BSC that may involve young people or adults at risk (England and Wales)/ protected adults (Scotland), and plans that indicate how safeguarding will be covered.
- To receive information from any team member, volunteers, children, parents or carers who have safeguarding concerns and record it.
- To assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate.
- To consult initially with a statutory safeguarding agency to test out any doubts or uncertainty
- To make a formal referral to a statutory safeguarding agency or the police
- To record statements from any member of the team who feels that a young person has indulged in inappropriate behaviour or made sexually suggestive comments or approaches.

The DSL role is specified in the individual's job description.

The named DSL/DCPO/DLPs at BSC are:

School	Designated Safeguarding Lead	Safeguarding Deputy
Brighton	James Openshaw	Laura Paterson
Dublin (DLP)	Natalia Lopes	Mark Mullally
Edinburgh (DCPO)	Ian Cameron	Simon Bardet, Sioban Ingram
London Central	Claudia Gonzalez	Andrew Daventry, Saerom Lee and Ed Brant
London Hampstead	Karen Stewart	Elisabetta Lucciola

Manchester	Giulia Mella	Clare Sargeant
Oxford	Luca Rami	Sean Ahern, Amber Hussain, Peter Whitehead
York	Coralie Berthet	Paul Miller
BSC Juniors	Julia Radlinger	Centre Manager
BSC Online	Jack Prince	

Contact details for the DSL/DCPO/DLP and Deputies are outlined in the relevant local safeguarding policy (see Appendix D)

In each centre there will be a member of the team nominated as a point of contact for all under 18s. This may be the DSL/DCPO/DLP, their Deputy or another member of the team who will be trained to an equivalent level. They are introduced during the welcome induction in the first week when the member of the team introduces themselves and their role (primarily as a nominated point of contact for any issues). The member of the team will also go through the curfew rules and check that the information provided is understood and they have no concerns to raise. They will meet with under 18 year old students during their course to ensure that they have no concerns and that they are given the support they need.

The role of the deputy safeguarding lead is to conduct the role of the DSL/DCPO/DLP in their absence. For this reason, the DSL/DCPO/DLP and the deputy will not be authorised leave at the same time, unless when another person is trained to cover the role.

4.2 BSC TEAM

All of the BSC team are required to take shared responsibility for the safeguarding and safety of any young people and adults at risk in school. The BSC team may be considered in a position of trust, in particular those team members who teach, support, guide or in any way interact with students, young people and adults at risk visiting the school and should be aware of the significance of this position. It is incumbent on all the BSC team to be aware of this policy and to act accordingly at all times.

4.2.1 SAFER RECRUITMENT

BSC has a rigorous recruitment process that includes safeguarding measures to ensure that candidates have been suitably vetted. All BSC team members responsible for recruitment will have completed an 'in-house' Safer Recruitment training course. (For full details on our safer recruitment process, please refer to the BSC Recruitment Policy).

4.2.1.1 Statutory Safer Recruitment Requirements for people working with children and adults at risk.

Under the Children's Act 2004 all roles with children and young people must satisfy safer recruitment standards including appropriate checks on new BSC team members and volunteers.

BSC policies aim to follow relevant legislation and guidelines which includes:

- The Education Act (2002) Section 175
- The Children Act (1989 and amendments) incl. The Children Act 2004
- Sexual Offences Act 2003
- Serious Crime Act 2015 (Commencement No 6) Regulations 2017
- Working Together to Safeguard Children (Revised February 2017)
- Information Sharing 2018
- Keeping Children in Education Safe Updated September 2019

For BSC schools using volunteers, they will be required to complete a risk assessment for each volunteer to decide whether they need an enhanced DBS check or not. Even if a criminal check is conducted, if the volunteer is not in regulated activity, then BSC is not legally allowed to conduct a barred list check. We need

to ensure that the pre-employment checks conducted on behalf of each individual is relevant to the role they have accepted.

4.2.2 UPDATES ON CRIMINAL CHECKS

BSC wish to ensure the continued safety of our team and students, therefore we have adopted best practice in subscribing all permanent team members based in England to the DBS Update Service where possible. BSC will run the check on the Update Service annually for those team members. BSC team members who are on the Scottish PVG Scheme should ensure that their details are updated at all times and ensure that BSC is listed as their employer in order that BSC would be informed of any changes to criminal data. All team members recruited in Ireland will be required to have a valid Garda check. As these are specific to the school that requests the check, Garda checks from other employers will cannot be used.

Following joining the Company, all BSC team members must report any subsequent criminal convictions, cautions, reprimands, investigations and warnings to their line manager. Failure to do so will result in disciplinary action being taken and may be considered gross misconduct.

Should any safeguarding concern be raised regarding an individual, BSC will make the discretionary decision whether to redo a criminal record check to ensure the welfare of the students.

Failure to comply with any request to redo a criminal record check, may lead to disciplinary action and dismissal.

4.2.3 BSC TEAM INDUCTION

As part of induction, the following will be undertaken

- Making known to all BSC team members the policies and procedures in place that promote the safety and welfare of children and adults at risk.
- All new team members will meet with the DSL/DCPO/DLP or Deputy on their first day (where possible) for a safeguarding induction (see checklist – Appendix E) during which the DSL/DCPO/DLP will confirm the difference between a concern (something that seems not to be right but is of no immediate danger to the under 18) and a serious issue (where the under 18 could be in danger of harm/abuse and an urgent response is required).

4.2.4 TRAINING

In accordance with good practice BSC will ensure that the DSL/DCPO/DLP, deputies and other team members likely to be in regular contact with under 18s and adults at risk receive appropriate training.

All BSC team members are expected to have Basic Awareness training (previously Level 1), usually the BSC Basic Safeguarding & Prevent Online Training. A pass mark of 85% is required for the BSC training to ensure the training has been understood. Designated team members may have advanced safeguarding training (previously Level 2), usually delivered via external training. This may be appropriate for team members who are visiting homestays and will be expected to review safeguarding knowledge. The DSL/DCPO/DLP and their deputies must have specialist training (formerly Level 3) or equivalent. This is delivered via external training.

BSC will also provide information in the form of posters to raise awareness to ensure that all the BSC team understands what to do if a student or visitor covered by this policy discloses abuse or any other safeguarding issue.

Annual refresher training will take place. If team members are unable to be present, they will be sent copies of the training. It is expected that in this instance, the team member will send confirmation of receipt and understanding of the training to their line manager.

All training will be recorded against the team member's record for future reference.

4.2.5 EXPECTATIONS OF THE BSC TEAM IN RELATION TO SAFEGUARDING

All of the BSC team should understand that safeguarding students is paramount and takes priority over any other workload.

All of the BSC team must wear an identification badge at all times on BSC premises so that they are clearly identifiable. This can be worn either using the BSC team members' lanyard or a clip-on badge.

All of the BSC team must be familiar with BSC's Code of Practice for the BSC team attached as Appendix A.

All of the BSC team must be familiar with BSC's Code of Behaviour for Young People and Adults attached as Appendix B.

All of the BSC team members must be familiar with the concept of "Position of Trust". It should be noted that whilst a young person in the UK can consent to sexual activity once they reach the age of 16, the Sexual Offences Act 2003 makes it a criminal offence for a person to engage in any kind of sexual activity with a person under 18 where the adult is in a position of trust

All of the BSC team are expected to maintain a professional working relationship with students at all times regardless of their age.

4.3 CONSENT FROM PARENTS OR GUARDIANS

All parents/guardians of a student under the age of 18 will be asked to provide written consent for their child to attend a BSC course. The written consent outlines a number of conditions and refers the parent/s/guardian to this policy for further information.

Any medical history is requested as part of the parental consent form and provides the authority for Certified Emergency personnel to deal with medical situations.

Where a booking for an under 18 does not include the arrival transfer, parents/guardians are asked to provide details on a No Transfer Form of how the student will be travelling independently from the port of entry to the school/homestay to form part of the risk assessment of the journey.

4.4 UNSUPERVISED TIME OF UNDER 18S OUTSIDE OF THE CLASSROOM

Under 18s on an adult course will have periods of unsupervised time for example: journeying between their homestay and school, shopping time, time after lessons before they need to be home for the evening meal, time between the evening meal and curfew, weekend day times etc. Parents/guardians will have been made aware of this as part of the parental consent (see 4.3).

Each school will have more information about this as part of their Local Safeguarding Policy,

4.5 ACCOMMODATION

A number of students are accommodated with homestay families. When recruiting homestays a number of safeguarding procedures must be followed:

- To visit and vet all applicants before accepting as a homestay. All members of the family and any regular visitors to the household must be declared to the school on the initial application. Homestay families should be made aware by the school that the school needs to be informed of any changes regarding long term residents or regular visitors after the initial application declaration has been made.
- To ensure that there is a bank of suitable criminal checked homestays that can be used for under 18s
- The main carer in each homestay for under 18s must have a current and enhanced DBS or PVG (Scotland) disclosure. The check will have included that the work happens in their home so that the DBS will check the address, including all adult members of the household. In Scotland everyone over 18 will need a PVG check.

A 'satisfactory' check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post. Should the school be informed of a previous conviction which does

not indicate a direct threat to the safety of the students, BSC will interview the homestay provider to garner more information.

BSC will consider any convictions which have been recorded in terms of the following:

- Nature, seriousness and relevance of the offence
- How long ago the offence occurred
- If the offence was a one-off or part of a history
- Circumstances of the offence being committed
- Country of conviction
- Decriminalisation

If the DSL/DCPO/DLP or SEM considers that there is no threat, a rationale will be provided and kept on file stating the reasons without stating the actual conviction.

All host families still employed to look after children must report any subsequent criminal convictions to the SEM. Failure to do so may result in immediate termination of our contract/agreement

- To re-visit homestays who host under 18 year olds annually. The revisit to be carried out by BSC team members who have Advanced Safeguarding (Level 2).
- To check host details and profile annually to ensure that details have not changed.
- To ensure that all under 18s and their hosts follow the school's agreed evening curfew: 22:00.
- Homestays, which prove to be unsuitable for whatever reason, are to be removed from the homestay register. Serious concerns will be immediately reported to the local authorities and/or the Local Authority Designated Officer (LADO).
- To ensure that the main carer in homestays sign and return a copy of the Children's Act 1989 (Part 1X), declaring any convictions or offences against children on behalf of all other adults in the home.
- To ensure that the main carer in homestays is informed in writing about BSC's commitment to safeguarding children and relevant procedures.
- To ensure that the main carer in homestays is provided with training on "Basic Awareness in Child Protection" and "PREVENT" awareness.
- To ensure that the homestays have received guidance on the use of the internet as part of their Code of Conduct.
- To ensure that there is a risk assessment available for the journey to and from school.
- To ensure that students' parents or guardians provide written consent for activities outside of the agreed curfew. The school has the right to amend or refuse such requests in accordance with school policy and accreditation guidelines.
- All parents' contact numbers from the consent letter must be entered on the school database as soon as possible and ideally before the student arrives. If an under 18 does not arrive within 1 hour of their expected arrival time, the host is instructed to call the school emergency phone and a BSC team member will then contact the parent and if necessary report them as a missing person to the police.
- To offer only homestay half or full board homestay accommodation to under 18 years to ensure that they are not forced to eat take-away or cook for themselves in the evenings.
- To provide guidance to hosts, residential BSC team, and group leaders about how they should behave around under 18s where privacy is important especially regarding bedrooms and showers/bathrooms. This is formed as part of the agreement with host families directly recruited by BSC.
- To ensure that the accommodation team are aware of the procedure for private fostering arrangements and informing local authorities. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (18 years if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for more than 27 nights.
- To ensure that residential accommodation (including student houses) is not made available to under 18s except as part of the BSC residential junior programmes or where appropriate provisions have been put in place to ensure the safeguarding of the under 18.

4.6 SOCIAL PROGRAMME

The managerial responsibility for any programme or activity rests with, firstly, the SEM and secondly the individual who is directing or organising the activity.

Those members of the team involved in social programmes are expected:

- To ensure that the activity is planned, organised and delivered in accordance with the Safeguarding Children and Adults at Risk Policy.

- To arrange the checking, training, induction and guidance for all other team members and volunteers involved in the social programme activity
- To complete a health and safety risk assessment for each activity.
- To ensure there is appropriate levels of supervision as outlined in the risk assessment.
- To ensure that there is a variety of social programme activities suitable for under 18s.
- To ensure that students are familiar with 24 hour emergency telephone number and that they know to call this number at any time if a concern arises.
- BSC team members, when they are responsible for a social programme activity, must ensure that under 18s adhere to curfews, do not drink alcohol and are protected from potential harm.
- BSC team members leading a social event are not allowed to drink alcohol whilst responsible for the students.
- BSC team members leading a social event should be aware of the procedures to follow if an incident arises e.g. an U18 goes missing, there is a medical emergency.
- BSC team members leading a social event should be aware of the emergency action procedures.

4.7 YOUNG LEARNERS (AGED 12-16)

BSC Adult schools may welcome closed groups which include students under the age of 16 but with a minimum age of 12. When welcoming these groups, the school will apply the following:

- The group will be accompanied by a group leader or teacher with a minimum ratio of one leader per 15 students
- Agents sending group leaders to accompany students will be required to provide a signed agreement stating that they hold records of current police checks or certificates of good conduct for group leaders from their country of domicile stating that they are suitable to work with children and that they have no outstanding criminal convictions that would affect their suitability to accompany students in a supervisory role in the UK. BSC reserve the right to request sight of these documents. Where Groups are arranged not via a recognised educational institution, the Group Leader must provide originals of a current police check or certificate of good conduct to BSC.
- The group leader will be available to assist BSC team members and communicate school policies and procedures to the students.
- The group leader will assist as a supervisor on any external trips and activities for their group and will not be requested to assist with any other activity for students not from their group.
- A responsible adult will always be present overnight in the accommodation, usually homestay. In the instances where this is a residence/hotel, the responsible adult may be the group leader or a BSC team member.
- Students under 16 will not be accommodated with those over 18.
- Students under 16 will not be placed in the same classes as those with over 18s unless part of a closed group. Closed groups of U16s will be placed in classes with different break times to regular classes so students do not mix in the common areas or if break times are at the same time, they will be kept in a separate area away from adult students.
- Under 16s are not allowed unsupervised free time. They will either be at school, at their accommodation, on an organised activity or travelling between the school and home/activity.

4.8 EXTERNAL SUPPLIERS AND VISITORS TO THE SCHOOL

BSC will ensure that all suppliers (taxi drivers, excursion company employees) who are contracted for under 18 students have provided written confirmation that they will only use drivers who have been vetted in accordance with our Recruitment Policy.

All visitors to the school premises will be required to sign in on arrival and will follow the local safeguarding policy procedure for visitors. (see Appendix D).

4.9 ONLINE COURSES

BSC offers English language tuition to students via video conferencing to students who may be in any location around the world. For all students that are under 18:

- Parent/Guardian asked for their consent for the student to take part in these lessons
- The lessons will be delivered securely via the BSC Adobe Connect platform
- Lessons may be recorded for compliance purposes

4.10 WORKING WITH STUDENTS WITH SPECIAL EDUCATIONAL NEEDS (SEN) AND/OR DISABILITIES

Where possible BSC will identify any students with SEN and/or disabilities and ensure that there are appropriate support measures in place. This may be indicated at the time of booking or is most likely to be when the student presents to, or is referred to, student experience team or the school's welfare officer. There must be an awareness that behaviour, mood and injury may relate to possible abuse and not necessarily be as a result of the specific SEN or disability that has been identified. It should also be noted that these students are of a higher risk of peer group isolation and may have additional challenges with communication.

Any BSC team member with concerns regarding a student whom they believe fall into this category must contact the DSL/DCPO/DLP who will consider what, if any, additional pastoral care should be put in place.

5. SEARCHING, SCREENING AND CONFISCATION

In January 2018 the Department for Education issued advice for headteachers, school staff and governing bodies in relation to Searching, Screening and Confiscation.

School employees can search a student for any item if the student agrees.

SEMs and any BSC team member authorised by the SEM can search a student, without their consent, where they have reasonable grounds for suspecting that the student may have a prohibited item. Prohibited items include: knives or weapons; alcohol; illegal drugs; stolen items; or any item that the BSC team member reasonably suspects has been or is likely to be used to commit an offence, or to cause personal injury to, or damage to the property of, any person (including the student).

The BSC team member can seize any prohibited item found as a result of a search. They also can seize any item they consider harmful or detrimental to school discipline.

For full details please refer to <https://www.gov.uk/government/publications/searching-screening-and-confiscation>

6. ALLEGATIONS OF ABUSE OR INAPPROPRIATE BEHAVIOUR INVOLVING BSC TEAM MEMBER

Allegations involving a BSC team member and a student should be reported to the Line Manager and to the DSL/DCPO/DLP. If the allegations involve the DSL/DCPO/DLP, then the SEM must be informed.

All allegations will be followed by an investigation which may lead to disciplinary action including gross misconduct. For full details on the process please see the BSC Disciplinary Policy. Consideration will be given as to whether the situation falls within the definition of abuse. If the SEM and DSL/DCPO/DLP believe that the allegations constitute abuse, they will contact the Local Authority Designated Officer (LADO) immediately and follow their instruction.

7. ALLEGATIONS OF ABUSE OR INAPPROPRIATE BEHAVIOUR INVOLVING STUDENTS

Allegations between students should be reported to the SEM and/or DSL/DCPO/DLP.

Consideration will be given as to whether the situation falls within the definition of abuse. If the SEM and/or DSL/DCPO/DLP believe that the allegations constitute abuse, they will contact the Local Authority Designated Officer (LADO) immediately and follow their instruction. These allegations are to be kept completely confidential by all BSC team members involved at all times.

8. WHISTLE-BLOWING POLICY

It is a legal requirement to disclose a concern and appropriate action is taken. Where there are concerns about the way that safeguarding is carried out in the school, the BSC team member should refer to the Whistle-blowing Policy.

The NSPCC runs a whistleblowing helpline on behalf of the Home Office, the number is 0808 800 5000.

9. RECORDING INFORMATION

All personal data will be processed in accordance with the requirements of the Data Protection Act 2018 and General Data Protection Regulation 2018. Due to public interest in safeguarding children in our communities we will retain safeguarding data for a longer period than other types of data. Safeguarding data will be collected by the DSL/DCPO/DLP or deputy and recorded via a Safeguarding Log. This will be help on a Central Safeguarding Log by the Group Safeguarding Manager. If appropriate the DSL/DCPO/DLP or deputy may pass the relevant information on to the Police or other relevant government authority. The record of the data will include the nature or detail of the concern and whether any action was taken.

9.1 CONSENT REGARDING USE OF PHOTOGRAPHS AND VIDEOS

For any BSC activity involving young people, parents or guardians will have been asked to give permission for photographs, videos or other images to be made of their children for the purposes of promoting social programme activities. Parents or guardians will be given the right to refuse to give permission for their children to be interviewed by press, broadcasters or other media before any such activity may take place. For further information see the BSC Data Protection Policy.

APPENDIX A: CODE OF CONDUCT - GOOD PRACTICE FOR THE BSC TEAM

The following guidelines are intended to be a common sense approach that both reduce opportunities for the abuse of young people and adults at risk and help to protect BSC team members, students and volunteers from any false allegation.

YOU SHOULD

- Treat all young people and adults at risk with respect and respect their right to personal privacy
- Follow our guidance and policies in relation to data protection
- Ensure that, whenever possible, there is more than one adult present during activities or that you are within sight or hearing of others
- Exercise caution when discussing sensitive issues with children or adults at risk
- Exercise caution in initiating any physical contact with a young person or adults at risk
- Operate within the guidance offered by this Code
- Challenge all unacceptable behaviour and report all allegations or suspicions of abuse
- Be aware of the school's rules in relation to alcohol, drugs and smoking
- Avoid becoming personally involved in a student's personal affairs.
- Be aware that their personal web profiles on social media can be viewed by anyone and therefore should be especially cautious about their public web profiles and privacy settings
- Be an excellent role model to other BSC team members and students
- Be aware of the effect your appearance has on students and the importance of presenting appropriately e.g. in class, on activities, in accommodation.
- Be aware of the school's policy on gifts.
- Remember that when dealing with a child protection issue, information must only be shared with the designated team, not with anyone else, including their own family. Confidentiality about both the victim and the accused must be maintained.

YOU SHOULD NOT

- Establish or seek to establish social contact with under 18s/students during the course.
- Give personal email addresses or personal phone numbers to students under 18.
- Electronically or verbally communicate via email, text, phone, social networking sites, blogs, web pages or messaging services with under 18s, except when necessary on a business device as part of role requirements such as using the emergency phone.
- Send sexual messages to under 18s in England and Wales in accordance with the enactment of the Serious Crime Act 2015 which came into force 3 April 2016.
- Post photos or videos of students under 13 on any website or social networking sites. Permission is required from any student over 13 for use by BSC for school purposes only.
- Spend excessive time alone with young people or adults at risk away from others.
- Take young people or adults at risk alone in a car journey, however short unless organised through the school. In this instance, the under 18 should sit in the back of the car as there is room to do so.
- Take young people or adults at risk to your home.
- Engage in physical or sexually provocative games including horseplay.
- Allow or engage in inappropriate touching of any form.
- Make over-familiar or sexually suggestive comments or approaches to a young person or adult at risk even as a 'joke'.
- Let allegations, over familiar or sexually suggestive comments or approaches made by a young person or adult at risk go unchallenged or unrecorded.
- Do things of a personal nature that young people or adults at risk can do for themselves.

UNDER 18S SEEKING PERSONAL CONTACT WITH BSC TEAM MEMBERS

- If an under 18 seeks to establish personal contact, the BSC team member should be aware that such social contact could be misconstrued. BSC team members should inform their line manager if a student is seeking social contact with them OR If a student is seeking social contact with a team member, the team member should direct the student to this policy to explain why the contact is unnecessary and against company policy.

- BSC team members should be made aware that it is an offence to engage in sexual communication with a child. The offence covers both online and offline communication, including through social media, e-mail, and letters with adult groomers facing up to two year in prison and being automatically placed on the sex offenders register in England and Wales.
- Appropriate professional contact (on behalf of the business via a business device or work environment)
- BSC team members must maintain neutral, friendly relationships with students while avoiding exclusivity or overfamiliarity.
- BSC team members must resist any attempt by a student to develop an overfamiliar or exclusive social relationship.
- If a student confides sensitive personal information, BSC team members have a duty to listen and respond in a professional manner in accordance with organisational guidelines.
- BSC team members have a duty to report to the employer any actual or perceived inappropriate development of the relationship between student and a BSC team member, electronic or otherwise.

ELECTRONIC CONTACT INCLUDING SOCIAL NETWORKING SITES

- BSC team members must only use the school VLE (Virtual Learning Environment) for any electronic contact with a student before, during or after a course.
- In any electronic contact with students, BSC team members must pay particular attention to use neutral, non-emotive language that will not be misconstrued.
- BSC team members must not exchange any information with a student that they would not be happy to share with the child's parent or carer.
- BSC team members must avoid the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings.
- BSC team members must not initiate or agree to 'friendship' requests or similar with students that will result in the sharing of personal information, photos, status updates, etc. For example, if a BSC team member receives a Facebook friend request from a current student they should inform their line manager or the DSL/DCPO/DLP so that there is complete transparency and they should not accept the request.
- BSC team members should be particularly cautious about their public web profiles and privacy settings.

FAILURE TO COMPLY

- Non-compliance with the above policy will result in disciplinary procedures. In the instance where it is deemed that the non-compliance falls under gross misconduct, BSC will follow the appropriate procedures as outlined in the BSC Disciplinary policy. Examples of gross misconduct which may render an employee liable to summary dismissal include, but are not limited to, the following:
 1. Insulting, aggressive or abusive language and/or behaviour
 2. Indecent or immoral behaviour
 3. Deliberately withholding information about other employees who break Company rules and procedures, regardless of their status
 4. Discrimination, harassment, victimisation or other unlawful discrimination against other employees, students or suppliers.
- BSC has a duty to remove an individual from regulated activity where there is risk of harm to children.
- BSC have a 'duty to refer' to external authorities* any suspicion or allegation of inappropriate contact by an individual engaged in regulated activity where there is risk of harm to children. (*ISA, police, local child protection authorities).

APPENDIX B: CODE OF BEHAVIOUR FOR CHILDREN & ADULTS AT RISK (ENGLAND AND WALES/PROTECTED ADULTS (SCOTLAND))

British Study Centres (BSC) is a language school for the education of students, including children aged under 18. All people visiting BSC, either privately or with an organised group, are expected to respect BSC team members, students and its buildings and grounds.

BSC seeks to offer visitors a safe and caring environment. In return, you must:

- Respect the rights and dignity of each other and of the BSC team and other helpers
- Respect the rules of BSC which include:
 - Purchase, sale and consumption of alcohol, recreational/nontherapeutic drugs and substances for abuse is forbidden.
 - Smoking is banned in all buildings at BSC and is only allowed within outdoor areas specifically designed for this practice.
 - All rules and safety/emergency procedures such as fire drills must be followed
 - Participants in organised events are expected to attend all timetabled activities unless they have been granted specific leave of absence.
 - Inappropriate physical intimacy among participants is not permitted.
 - Serious incidents of misbehaviour such as fighting, racial/sexual abuse, damage to property, indecent language and failure to obey instructions will normally lead to expulsion from the activity and possibly from the BSC course, in accordance with our Terms and Conditions.

APPENDIX C: RECOGNISING ABUSE (PRIMARY AND SECONDARY)

Abusers can be anyone and anywhere. An abused person is someone, who has suffered physical injury, neglect, emotional or sexual abuse. In many cases, an abused person will suffer more than one type of harm, for example physical injury and emotional abuse. Importantly, abuse can result in the individual suffering significant harm and at worst, can lead to death. Definitions of abuse vary across time, culture and geography. We know more about abuse now but there are no reliable figures from previous generations to compare with today's figures. Abuse is NOT the abused person's fault. Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. Individuals may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger for example, via the internet. They may be abused by an adult or adults, or another under 18 or under 18s. Often the abuser is known to the individual, such as a member of the family, neighbour, or family "friend".

Abusers may be anyone:

- Any age
- Male or female (including sexual abuse)
- From any social class, culture or faith
- 'Nice' people
- Professionals such as teachers, religious leaders or social workers
- Related to the under 18
- Other under 18s
- Those in a position of power or trust

What are the Types of Abuse?

- Sexual Abuse
- Physical Abuse
- Emotional Abuse
- Neglect

Abusers can use a combination of different types, physical and sexual abuse

PRIMARY ABUSE

SEXUAL ABUSE

Sexual activity with or directed toward a person under 18 by an adult who is in a position of trust with under 18 year olds is a criminal offence (Sexual Offences Act 2003)

Some arrive in a job with a pre-meditated desire to abuse children; others develop it while in the job. Therefore safer recruitment alone is not enough to provide adequate safeguarding for children.

A sexual abuser typically goes on a journey:

- Feeling emotionally connected to children and having few adult relationships / pastimes
- Overcoming his/her own conscience, by, for example, seeing that child porn is available on the Internet so it must be OK and/or by re-interpreting children's behaviour to be sexual and flirtatious when it isn't
- Grooming adults so they see the abuser as normal / respectable / responsible
- Grooming children, especially those in need, testing their boundaries in minor ways at first, so that should there be any complaint, it would be easy to explain away.
- Slowly develop a relationship with the child, pushing the boundaries of sexual behaviour gradually further

Sexual abuse involves forcing or enticing an under 18 to take part in sexual activities, not necessarily involving a high level of violence, whether or not the under 18 is aware of what is happening. 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. They may also include non-contact activities, such as involving under 18s in looking at, or in the production of, sexual images, watching sexual activities, encouraging under 18s to behave in sexually inappropriate ways, or

grooming an under 18 in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other under 18s.

Physical signs of sexual abuse include:

- Repeated, inappropriate, masturbation
- Presence of sexually transmitted disease
- Young children with age inappropriate sexual knowledge, e.g. penetration, ejaculation, oral sex
- Explicit sexual drawings
- Pain, soreness or itching in the genital or anal areas or mouth
- Recurrent genital or urinary infections.
- Pregnancy

Behavioural signs of sexual abuse include:

- Disclosure from a child (to another child or an adult)
- Young children acting out sexual behaviours, e.g. simulating intercourse, grabbing genitalia etc.
- Young children displaying sexually inappropriate knowledge or behaviour
- Persistent bedwetting, nightmares and sleep problems
- Anorexia, bulimia, self-harm or excessive 'comforting' eating
- Fear of a specific person
- Running away from home
- Substance abuse
- Child having unexplained gifts, including money
- Children having 'secrets' that an adult says they are not allowed to tell
- Secrecy around internet use and webcams etc.

PHYSICAL ABUSE

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to an under 18. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in an under 18. Physical abusers:

- Are not usually pre-meditated (unless sadists) but are usually reactive abusers.
- They typically lack self-restraint and don't have appropriate strategies for managing
- Conflict and/or difficult children

Physical signs of physical abuse include:

Everyone can have accidents and may have bruises from time to time. The under 18 or his or her parents/guardians will usually tell you how the injuries occurred and what happened. However, if they do not tell you or do not give you an adequate explanation of what happened, you need to consider whether the injuries are a possible sign of physical abuse. Sometimes an under 18 can be physically abused without easily identifiable signs of injury, so it is important to act on concerns so professional assessments can be made.

Injuries not adequately explained including: fractures, bruises, burns, bite marks, slap marks and implement marks (e.g. belt mark).

Other signs of abuse include

- Grip marks - may indicate shaking
- Slap marks - cheeks, buttocks, limbs (may leave a hand imprint)
- Soft tissue marks
- Long marks

- Symmetrical bruising
- Bruising in unusual places e.g. bruises on ears
- Teeth / bite marks
- Burns with outline, e.g. outline of an iron
- Cigarette burns
- Fractures or other injuries
- Injuries which haven't been treated properly and there is delay in seeking medical attention

Behavioural signs of physical abuse include:

- Under 18 appears frightened of others e.g. parent(s) or carer(s)
- Under 18 doesn't want to go home, or runs away
- Under 18 flinches when approached or when someone stretches a hand towards them
- Under 18 reluctant to get undressed e.g. for games or sport activity
- Under 18 very passive or very aggressive
- Frozen watchfulness – under 18 sits very still watching what's going on (waiting for the next hit)
- Equally could appear overly "happy" and "eager to please"

EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of an under 18 such as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying to them that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the under 18 opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age developmentally inappropriate expectations being imposed on under 18s. These may include interactions that are beyond the individual's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing them participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing under 18s frequently to feel frightened or in danger, or the exploitation or corruption of under 18s. Some level of emotional abuse is involved in all types of maltreatment of an under 18, though it may occur alone. Be aware that:

- All sexual abusers are emotional abusers
- Other forms of emotional abuse include failing to provide support to children needing it, and through constantly directing negative attention to a particular child.
- Bullying is the classic form of emotional abuse

Physical signs of emotional abuse include:

- Physical, mental and emotional developmental delay / late developer with no obvious medical reason
- Sudden onset speech disorders, e.g. suddenly developing a stammer

Behavioural signs of emotional abuse include:

- Acceptance of punishment which seems excessive
- Over-reaction to mistakes
- Continual self-deprecation
- Excessive fear of new situations
- Inappropriate emotional response to painful stimuli
- Excessive behaviours, e.g. rocking, head banging, pulling own hair out
- Self-harm and/or eating disorders
- Compulsive stealing/scavenging
- Excessively sad, depressed, withdrawn,
- Low self-esteem
- Very poor relationship with parent/carer

NEGLECT

The persistent failure to meet an under 18's basic physical and/or psychological needs, likely to result in the serious impairment of the under 18's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. From birth, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect an under 18 from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, an under 18's basic emotional needs.

Physical signs include:

- Looks excessively thin or ill
- Well below average weight and height, failure to thrive,
- Recent unexplained weight loss.
- Complains of hunger; lack of energy
- Untreated conditions/injuries
- Repeated accidents, especially burns
- Left home alone inappropriately
- Repeatedly unwashed, smelly or dressed inappropriately for the weather
- Supervision/carers inappropriate (e.g. 8 year old looking after other children)
- Badly decayed teeth
- Unhygienic and/or unsanitary living conditions

Behavioural signs include:

- Poor level of concentration
- Constantly hungry or 'stealing' food from others/from bins
- Not keeping Doctor or Hospital appointments
- Frequently not at school or persistent lateness
- Reluctant to go home from school
- Delayed speech development

SECONDARY FORMS OF ABUSE

RADICALISM & FUNDAMENTALISM

Tolerance and diversity are promoted and explained to all students during their induction. Should individual students exhibit intolerance or prejudice against other students or BSC team members based on race, culture, gender, religion, socio-economic status, age, or sexuality, their behaviours will be addressed by the school disciplinary policy. As part of the Counter Terrorism and Security Act 2015, schools have a duty to prevent people being drawn into terrorism 'Prevent Duty'.

Early indicators may include (this list is not exhaustive)

- Showing sympathy for extremist causes;
- Glorifying violence, especially to other faiths or cultures;
- Making remarks or comments about being at extremist events or rallies outside school;
- Evidence of possessing illegal or extremist literature;
- Out of character changes in dress, behaviour and peer relationships
- Intolerance of difference, including faith, culture, gender, race or sexuality.

Should a BSC team member suspect that any student or team member is the focus of attempts to radicalise them to a set of fundamentalist religious or political beliefs, the BSC team member should inform the SEM and/or DSL/DCPO/DLP immediately who will report the suspicions to the relevant authorities.

FEMALE GENITAL MUTILATION (FGM)

BSC believe that all students should be kept safe from harm. Female Genital Mutilation affects girls particularly from North African countries, including Egypt, Sudan, Somalia and Sierra Leone. Although BSC has few children from these backgrounds and consider girls in BSC schools safe from FGM, BSC will continue to promote awareness on the issue to ensure that if someone is suspected of experiencing FGM the BSC team are able to recognise and raise concerns in the correct way.

Should a BSC team member suspect a student is at risk of FGM they should inform the DSL/DCPO/DLP or SEM immediately who will then follow Safeguarding Reporting procedures (as outlined in the Local Safeguarding Policy – Appendix D). FGM is illegal in the UK and must be reported to the Police.

CHILD SEXUAL EXPLOITATION (CSE)

BSC believe that students should be kept safe from sexual exploitation. Child Sexual Exploitation (CSE) is defined as "a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 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. They victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology"

Indicators of CSE may include (this list isn't exhaustive):

- Acquisition of money, clothes, mobile phones etc without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Excessive receipt of texts/phone calls;
- Inappropriate sexualised behaviour for age
- Evidence of/suspicious of physical or sexual assault;
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours.

Potential vulnerabilities include (this list is not exhaustive):

- Recent bereavement or loss;
- Social isolation or social difficulties
- Having a physical or learning disability;
- Lack of a safe/stable home environment, now or in the past
- Sexual identity.

Should a team member suspect a student is at risk of CSE they should inform the DSL/DCPO/DLP or SEM immediately who will then follow Safeguarding Reporting procedures (as outlined in the Local Safeguarding Policy – Appendix D)

HONOUR BASED VIOLENCE (HBV)

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including FGM, forced marriage and practices such as breast ironing. All forms of HBV are abuse, regardless of the motivation, and should be handled and escalated as such. If in doubt, BSC team members should speak to the DSL/DCPO/DLP.

SEXTING

Whilst professionals refer to the issue as "sexting" there is no clear definition of "sexting". However in general "sexting" can be considered as when someone sends or receives a sexually explicit text, image or video. This includes sending 'nude pics', 'rude pics' or 'nude selfies'. Pressuring someone into sending a nude picture can happen in any relationship and to anyone, whatever their age, gender or sexual preference. However, once the image is taken and sent, the sender has lost control of the image and these images could end up anywhere. By having in their possession, or distributing, indecent images of a person under 18 on to someone else, young people are not even aware that they could be breaking the law as stated as these are offences under the Sexual Offences Act 2003.

Should a team member become aware of a sexting issue, they should inform the DSL/DCPO/DLP or SEM immediately who will then follow Safeguarding Reporting procedures (as outlined in the Local Safeguarding Policy – Appendix D)

PEER ON PEER ABUSE

There are many forms of abuse that may occur between peers and this list is not exhaustive.

Should a team member suspect a student is a victim of peer on peer abuse they should inform the DSL/DCPO/DLP or SEM immediately who will then follow Safeguarding Reporting procedures (as outlined in the Local Safeguarding Policy – Appendix D)

PHYSICAL ABUSE E.G BITING, HITTING, KICKING, HAIR PULLING

Physical abuse may include: hitting, kicking, nipping, shaking, biting, hair pulling, or otherwise causing physical harm to another person. There may be many reasons why a child harms another and it is important to understand why a young person has engaged in such behaviour, including accidentally before considering the action or punishment to be undertaken.

SEXUALLY HARMFUL BEHAVIOUR/SEXUAL ABUSE (E.G. INAPPROPRIATE SEXUAL LANGUAGE, TOUCHING)

Sexually harmful behaviour from young people is not always contrived or with the intent to harm others. There may be many reasons why a young person engages in sexually harmful behaviour and it may be just as distressing to the young person who instigates it as well as the young person it is intended towards. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault/abuse.

The "Sexual violence and sexual harassment between children in schools and colleges" was updated and republished May 2018. <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

BULLYING

Bullying is unwanted, offensive, intimidating, malicious or insulting behaviour, an abuse or misuse of power through means that undermine, humiliate, denigrate or injure the recipient that involves a real or perceived power imbalance. The behaviour may be repeated over time or a one-off incident. Both young people who are bullied and who bully others may have serious, lasting problems. Young people who bully use their power—such as physical strength, access to embarrassing information, or popularity—to control or harm

others. Power imbalances can change over time and in different situations, even if they involve the same people.

The term prejudice-related bullying (harassment) refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

Bullying includes actions such as making threats, harassing, spreading rumours, attacking someone physically or verbally or for a particular reason e.g. size, hair colour, gender, sexual orientation, and excluding someone from a group on purpose.

It is important that BSC team members remain vigilant and consistent and do not wait to see if the “victim” will complain.

CYBER BULLYING

Cyberbullying is the use of phones, instant messaging, e-mail, chat rooms or social networking sites such as Facebook and Twitter to harass threaten or intimidate someone similarly to the above.

It is important to state that cyber bullying can very easily fall into criminal behaviour under the Malicious Communications Act 1988 under section 1 which states that electronic communications which are indecent or grossly offensive, convey a threat or false information or demonstrate that there is an intention to cause distress or anxiety to the victim would be deemed to be criminal. This is also supported by the Communications Act 2003, Section 127 which states that electronic communications which are grossly offensive or indecent, obscene or menacing, or false, used again for the purpose of causing annoyance, inconvenience or needless anxiety to another could also be deemed to be criminal behaviour. If the behaviour involves the use of taking or distributing indecent images of young people under the age of 18 then this is also a criminal offence under the Sexual Offences Act 2003. Outside of the immediate support young people may require in these instances, the school will have no choice but to involve the police to investigate these situations.

TEENAGE RELATIONSHIP ABUSE

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual, and/or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and/or acts of physical or sexual abuse. The abusive teen uses this pattern of violent and coercive behaviour, in a heterosexual or same gender relationship, in order to gain power and maintain control over the partner.

APPENDIX D: LOCAL SAFEGUARDING POLICY

Please ask your local school for a copy of their Local Safeguarding Policy.

APPENDIX E: SAFEGUARDING INDUCTION CHECKLIST

This is a suggested checklist for induction – it may be adapted to suit the specific local needs of a school/centre.

	Induction
Know that safeguarding and promoting the welfare of children is everyone's responsibility.	
Know that children refers to everyone under the age of 18.	
Know who the local DSL/DCPO/DLP is and how to report any concerns to them and that all concerns should be made in writing using the safeguarding log. Ensure there is an understanding of the difference between a concern (something that seems not to be right but is of no immediate danger) and a serious issue (where there is the possibility of danger of harm/abuse and an urgent response is required).	
Be aware of the contents of the school's safeguarding policy – Group and Local	
Be aware of the contents of the school's team member behaviour policy (Code of Conduct) that forms part of the policy especially in relation to social media, photos and sharing of personal information.	
All BSC team members should be aware that they must take part in safeguarding training and update training as required and as a minimum, annually.	
All BSC team members must know that they should never promise a child that they will not tell anyone about an allegation.	
All BSC team members should understand the school's duty to prevent radicalisation and understand the signs when considering the risk of radicalisation (Prevent)	
All BSC team members should know that if a child is in immediate danger, or at risk of harm to call the police	
All BSC team members should understand the school's whistleblowing policy	
All BSC team members should be aware of meaning of 'Position of Trust' in the Sexual Offences Act 2003	
All BSC team members should read KSCIE (2018) Part 1 if in ISI accredited school.	