

Bosworth Independent College Safeguarding and Child Protection Policy Academic Year 2019 - 20

PERSONS RESPONSIBLE FOR POLICY:	<p><u>KAREN INMAN</u> (DSL)</p> <p><u>CRAIG WILSON</u> (PRINCIPAL)</p> <p><u>KEVIN JONES</u> (VICE PRINCIPAL)</p> <p><u>JAN MORLAND-NUTTALL</u> (COLLEGE ADVISORY BOARD MEMBER FOR SAFEGUARDING)</p>
APPROVED:	10 TH SEPTEMBER, 2019
SIGNED:	
	CRAIG WILSON (PRINCIPAL)
	KAREN INMAN (DSL)
	STEVE O'HARE (DEPUTY DSL. HEAD OF BOARDING)
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	JAN MORLAND-NUTTALL (ADVISORY BOARD MEMBER)
TO BE REVIEWED:	AUGUST 2020

At *Bosworth Independent College*, the named personnel with designated responsibility for safeguarding are:

Designated Safeguarding Lead	Deputy Designated Safeguarding Leads	Advisory Board Member acting on behalf of Proprietors (Bright Scholar UK (Holdings) Ltd
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The named personnel with Designated Responsibility regarding allegations against staff are:

Designated Senior Manager Principal	Advisory Board Chair (in the event of an allegation against the Principal)
<p><u>CRAIG WILSON</u> Craig.Wilson@bosworthcollege.com 07860 407641</p>	<p><u>MICHAEL SPENS</u> michaelspens549@gmail.com 07740 783564</p>

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1. AIM OF POLICY

Bosworth Independent College is committed to safeguarding and protecting all of its students. Bosworth is diligent in meeting statutory requirements. Bosworth staff attend and share training and development to ensure best practice and to help update and improve how the College keeps its students safe. As an international boarding college, Bosworth is conscious of students' needs and of Bosworth's duty to act in the best interests of the child, that is to say all our students from many cultures and traditions. Bosworth has an overriding duty to prevent them suffering from any significant harm or risk of harm. To help assure this, we work in partnership with local agencies, other schools and colleges, ISI, ISA, our parents/carers and all our students. The Aims of this Policy are:

- To inform staff, parents/carers, volunteers and Proprietors about the College's responsibilities for safeguarding children.
- To enable everyone to have a clear understanding of how these responsibilities should be carried out.
- To ensure that appropriate action is taken in a timely manner to safeguard and promote students' welfare.

This Policy is the responsibility of the Designated Safeguarding Lead and is approved by the Principal, the Chair of the Advisory Board and the Advisory Board Member for Safeguarding. The DSL permits input in writing the Policy from staff with safeguarding responsibility as she sees appropriate.

2. DEFINITIONS

Safeguarding and promoting the welfare of children is defined as:-

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. *Appendix 4 explains the different types of abuse.*

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. *Appendix 4 defines neglect in more detail.*

Children includes all students of the College.

(Keeping Children Safe in Education DfE, September 2019)

3. LEGISLATION AND STATUTORY GUIDANCE

This policy is based on the Department for Education's statutory guidance, **Keeping Children Safe in Education 2019** and **Working Together to Safeguard Children 2018 (updated 21st February 2019)**, **Prevent 2015** and the **Governance Handbook 2015 (last updated 22nd March 2019)**.

In putting this Policy into effect, Bosworth is committed to working with local agencies – Northamptonshire Local Safeguarding Partnership (NSCP), the Northamptonshire Multiple Agencies Safeguarding Hub (possible changes in Northamptonshire will be incorporated in this Policy when they begin), Northamptonshire County Constabulary, NHS stakeholders, the NSPCC and local schools and colleges according to Northamptonshire County Council's Safeguarding Children Partnership 2019 and Northampton Borough Council's Section 11 annual self-assessment.

This policy is also based on the following legislation and statutory guidance:-

- **The Children Act 1989 and The Children Act 2004 amendment-Section 11** of the Children Act 2004 places duties on a range of organisations and individuals to ensure their functions, and any services that they contract out to others, are discharged having regard to the need to safeguard and promote the welfare of children.
- Section 5B(11) of the **Female Genital Mutilation Act 2003**, as inserted by section 74 of the **Serious Crime Act 2015**, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- **Statutory guidance on FGM**, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- **The Rehabilitation of Offenders Act 1974**, which outlines when people with criminal convictions can work with children
- Schedule 4 of the **Safeguarding Vulnerable Groups Act 2006**, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains Colleges' duties under the **Counter-Terrorism and Security Act 2015** with respect to protecting people from the risk of

radicalisation and extremism

- Section 175 of the **Education Act 2002**, which places a duty on Colleges and local authorities to safeguard and promote the welfare of students
- The **College Staffing (England) Regulations 2009**, which set out what must be recorded on the single central record and the requirement for at least one person on a College interview/appointment panel to be trained in safer recruitment techniques
- **Sexual Offences Act (2003)**
- **The Equality Act 2010**
- The current Independent Schools Standards Regulations (**Education and Skills Act 2008 section 94**)
- The current **National Minimum Standards for Boarding**
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools/colleges to safeguard and promote the welfare of students at Bosworth (Academies, including free colleges, and independent schools and colleges)
- Part 1 of the schedule to the Non-Maintained Special Colleges (England) Regulations 2015, which places a duty on non-maintained special Colleges to safeguard and promote the welfare of students at the College (Non-maintained special Colleges)
- The Childcare (Disqualification) Regulations 2009 (and 2018 amendment) and **Childcare Act 2006**, which set out who is disqualified from working with children (All Colleges with students aged under 8)

This policy forms part of Bosworth's suite of documents and policies which relate to the safeguarding responsibilities of the College.

Bosworth Independent College complies with this guidance and the procedures set out by Northamptonshire Safeguarding Children Board.

In particular this policy should be read in conjunction with the College's:-

- Safer Recruitment Policy,
- Behaviour Policy,
- Positive Handling Policy,
- Anti-Bullying and Anti-Cyberbullying Policy,
- Staff Code of Conduct,
- Online Safety Policy and ICT Acceptable Use Policy,
- Bosworth College Whistleblowing Policy,
- Missing Student and Students Missing in Education Procedure,
- Boarding Staff Handbook
- Bosworth College Whistleblowing Policy

4. EQUALITY STATEMENT

Some children, students and young adults have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are living for the first time in the UK with unfamiliar values and traditions.

5. ROLES AND RESPONSIBILITIES

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the College and is consistent with the procedures of Northamptonshire Safeguarding Children Board, all relevant, current legislation, KCSIE 2019 and Working Together to Safeguard Children as last updated 2019.

Bosworth College's Safeguarding Policy and procedures and policies or procedures listed above also apply to **extended College and off-site activities** and to **students who attend Bosworth College's Summer School**.

5.1 All Staff

All staff will read and understand Part 1 and Annexe A of Keeping Children Safe in Education 2019, the Department for Education's statutory safeguarding guidance,

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/828587/Keeping_children_safe_in_education_part_one.pdf and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including the **Staff Code of Conduct**, the **role of the designated safeguarding lead (DSL)**, the **Behaviour Policy (including the Bosworth Code)**, and the safeguarding response to **children who go missing from education**
- The **early help process** and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

- **The process for making referrals to local authority children’s social care** and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do **if they identify a safeguarding issue** or a **child tells them they are being abused or neglected**, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- That any safeguarding concern must be referred to the DSL or one of her deputies within 24 hours in direct conversation and/or ideally by written record using **Bosworth’s Daybook Safeguarding Concern Form**. This refers a concern confidentially but electronically to the DSL and all her deputies. **See Appendix 3.**
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation. **Appendix 4 of this Policy outline in more detail how staff are supported to do this.**
- Sufficient staff are also trained in safer recruitment. Every recruitment process for a job at Bosworth includes a staff member trained in safer recruitment.
- Please refer to the NLSP website and Bosworth College safeguarding training materials for specific guidance on identification of neglect. Please see **NLSP Neglect Toolkit** including roles and responsibilities for interventions.

Training

Safeguarding and child protection training at Bosworth College includes the Principal, all teaching and boarding staff, all other categories of staff without exception and also volunteers or paid staff who are not members of Bosworth’s staff. This training includes online safety training. Regular, full training sessions occur at least every three years and normally every two years. Supplementary ‘top-up’ training occurs at least annually. The DSL keeps records of the training done and records to ensure full bi-annual or tri-annual training is received by all staff.

Induction training for new staff (whether permanent, temporary or volunteers) covers the following: this Safeguarding Policy; the Staff Code of Conduct; the Whistleblowing Policy; the Student Behaviour Policy; the safeguarding duties of staff with respect to Children Missing Education; the identity and job roll of the DSL and her deputies; the Bosworth Online Safety Policy; the current version of KCSIE + Annex A.

All staff are trained to handle and manage a disclosure on child-on-child sexual violence or of sexual harassment.

Contractors and other visitors working at Bosworth are given information so that they can contact the DSL in the event of any concern they wish to report.

The Advisory Board Member for Safeguarding with safeguarding responsibilities will complete appropriate governors training. The Advisory Board Member for Safeguarding (Jan Morland-Nuttall) always has up-to-date training.

Please use the full suite of documents and guidance contained within the NLSP webpages - including the Neglect Screening Tool – [Neglect Screening Tool](#)

5.2 The Designated Safeguarding Lead (DSL)

Our DSL is **KAREN INMAN**

The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during College hours for staff to discuss any safeguarding concerns. She may also be contacted out of hours.

Queen's Building ground floor; karen.inman@bosworthcollege.com; 07523 077604

When the DSL is absent, Deputy DSLs will act as cover.

Steve O'Hare; Queen's Building ground floor; steve.ohare@bosworthcollege.com; 07980 308348

Kevin Jones; Nazareth House ground floor; kevin.jones@bosworthcollege.com; 07780 474037

Craig Wilson; Nazareth House ground floor; craig.wilson@bosworthcollege.com; 07712 236963

At least one of the Deputy DSLs is always available, including out of hours and during holidays (for example, during out-of-hours/out-of-term activities). Any of them may be called by phone 24/7.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- The DSL will be a member of the College Senior Management Team.
- The DSL is a member of the Pastoral Committee chaired by the Vice Principal and also including the Head of Boarding and the College Nurse. The Pastoral Committee has weekly meetings (and other ad hoc meetings when need arises). It manages care of Bosworth students and advises the Principal on matters requiring her attention.

The DSL will also keep the Principal informed of any issues and liaise with Local Authority case managers and Designated Officers for child protection concerns as appropriate.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated. (*Annex B; Paragraph 2 Keeping Children Safe in Education 2019.*)

The full responsibilities of the DSL are set out in their job description. These include her role as **Online Safety Officer**.

The Designated Safeguarding Lead and her deputies should undergo formal training every two years. The DSL should also undertake Prevent awareness training. In addition to this training, their knowledge and skills should be refreshed, (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments), at least annually.

5.3 The Governing Board – Bright Scholar (UK) Holdings Ltd

The Proprietors ensure that the College designates an appropriate senior member of staff to take lead responsibility for child protection. This person has the status and authority within the College to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

The Proprietors appoint a Bosworth College Advisory Board to provide independent oversight of Bosworth College. This oversight includes gubernatorial oversight of safeguarding. The Chair of the Advisory Board is **Mr Michael Spens**. The Advisory Board Member for safeguarding is **Mrs Jan Morland-Nuttall** who has completed school governor's safeguarding training.



Michael Spens



Jan Morland-Nuttall

The DSL presents an annual report on safeguarding to the Advisory Board Member, the Principal and the SLT. Jan Morland-Nuttall also presents an annual report on safeguarding in Bosworth College to the Proprietors through the Chairman of the Advisory Board. There is a minuted discussion which also includes the Chair of the Advisory Board.

Where appropriate, Michael Spens (Chair of the Advisory Board) will act as the 'case manager' on behalf of Bright Scholar UK (Holdings) Ltd in consultation with the LEA's Designated Officer in the event that an allegation of abuse is made against the Principal. **(See Appendix 3 below.)** His contact details are **Mob: 07740 783564; Email: michaelspens549@gmail.com**

5.4 The Principal

The Principal is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when their child joins the College and via the College website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met, to enable the DSL and her deputies to fulfil their responsibilities under this Policy.

6. WHEN TO BE CONCERNED

6.1 Children Who May Require Early Help

All staff should be aware of the **early help process**, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the Designated Safeguarding Lead any ongoing/escalating concerns so that consideration can be given to a referral to Children's Services if the child's situation does not appear to be improving.

Early Help Links:

- Follow this link: [Early Help](#) to access Northamptonshire's information and support for professionals regarding Early Help.
- The Early Help Strategy Link: [Early Help Strategy](#)
- Early Help Co-ordinator Link: [Early Help Co-ordinators](#)

Staff and volunteers working within the College should be alert to the potential need for early help for children also who are more vulnerable, in need of additional support or at risk of harm. For example:

- **Students with a disability and/or specific additional needs.**
- **Students with special educational needs.**
- **Students who are acting as a young carer.**
- **Students who are showing signs of engaging in anti-social or criminal behaviour.**
- **Students whose family circumstances present challenges, such as substance abuse, adult mental health or learning disability, domestic violence.**
- **Students who are showing early signs of abuse and/or neglect.**
- **Students vulnerable or encountering difficulty living away from their families and cultures in the UK and in a boarding college.**
- **Students of different sexual orientations and gender identities and those still making their choices.**

- **Students in need of additional support because of mental health issues such as anorexia, self-harming, anorexia, depression, anxiety or with suicidal thoughts.**

6.2 Children with Special Educational Needs and Disabilities:

Additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

- Assumptions that indicators of possible abuse such as behaviour; including for example: ADHD or other specific behavioural problems/diagnosis, mood and injury relate to the child's impairment without further exploration;
- Assumptions that children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs;
- Communication barriers and difficulties;
- Reluctance to challenge carers, (professionals may over empathise with carers because of the perceived stress of caring for a disabled child);
- Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased;
- A disabled child's understanding of abuse;
- Lack of choice/participation;
- Isolation.

Directory of Services for Children with Disabilities: [Specialist-support-for SEND](#)

Northamptonshire's Local Officer: [SEND Local Offer \(Northamptonshire CC support for students with SEND\)](#).

6.3 Looked after children

When a looked-after child is a student at the College, a member of staff has current relevant training (currently Miss Rachel Wilkinson).

6.4 Managing referrals and cases

Bosworth College undertakes to refer without exception all cases of suspected abuse or neglect to the Multi Agency Safeguarding Hub (MASH), the Police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern. Referrals must always be made within 24 hours. Safeguarding referrals must be made in one of the following ways:

- By telephone contact to the Multi-Agency Safeguarding Hub (MASH): 0300 126 1000 (Option 1)

- By e-mail to: MASH@northamptonshire.gcsx.gov.uk
- By using the online referral form found at:
<http://www.northamptonshirescb.org.uk/more/borough-and-district-councils/how-to-make-an-online-referral/>
- In an emergency outside office hours, contact children's social care out of hours team on 01604 626938 or the Police
- If a child is in immediate danger at any time, left alone or missing, you should contact the police directly and/or an ambulance using 999
- Referrals are normally made by the DSL or one of her deputies. However, staff are aware that **ANY MEMBER OF STAFF can make a referral if they are concerned.**

6.5 Peer on Peer Abuse, sexual violence & sexual harassment

Education settings are an important part of the inter-agency framework not only in terms of evaluating and referring concerns to Young people's Services and the Police, but also in the assessment and management of risk that the young adult or young person may pose to themselves and others in the education setting.

We recognise that young people are capable of abusing their peers. Abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Most cases of students hurting other students will be dealt with under the College's Behaviour Policy and Anti-Bullying and Anti-Cyberbullying Policy but this child protection and safeguarding policy will apply to any allegation that raises safeguarding concerns. This might include where the alleged behaviour:

- Is serious and potentially a criminal offence
- Could put students in the College at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting or upskirting)

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse. When considering whether behaviour is abusive, it is important to consider:

- Whether there is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- Whether the perpetrator has repeatedly tried to harm one or more other children; or
- Whether there are concerns about the intention of the alleged perpetrator.

Peer on peer abuse can manifest itself in many ways and different gender issues can be prevalent. Severe harm may be caused to children or young people by abusive and bullying behaviour of other young people and children, which may be physical, sexual or emotional and can include gender

based violence/sexual assaults, sexting, domestic abuse, peer-on-peer exploitation, serious youth violence, sexual bullying or harmful sexual behaviour.

Guidance on responding to and managing sexting incidents can be found at: [Sexual violence and sexual harassment between children in Colleges and colleges.pdf](#) [Sexting In Colleges FINAL Jan17.pdf](#)

In order to minimise the risk of peer on peer abuse, the College:

- Provides a developmentally appropriate PSHE curriculum which develops students' understanding of acceptable behaviour and keeping themselves safe.
- Has systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued.
- Includes careful care and support of victims: pastoral support and confidence building; keeping safe; how to deter or avoid reasonably situations leading to bullying.
- Develops robust risk assessments where appropriate.
- Maintains a written log (an Excel table) of bullying events enabling patterns, venues, names and times to be identified to better understand, investigate and stop bullying.
- Has proper care of perpetrators in bullying events. This does not obviate the need for appropriate disciplinary action but seeks to prevent repeated behaviour by the victim understanding the consequences of their actions, the inherent misuse of power and long term legal and social implications of bullying. The reasons for a perpetrator's actions should be identified so they can be challenged, and responses made more effective.
- Encourages an anti-bullying culture which disapproves of and seeks to prevent '**by-standing**' so that students feel empowered and required to intervene and/or report immediately any incident of bullying behaviour they encounter or are aware of.
- Have relevant policies in place (e.g. the Behaviour Policy and Anti-Bullying and Anti-Cyberbullying Policy).

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and

- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is Sexual Violence and Sexual Harassment?

Sexual violence

It is important that College and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (Colleges and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.
- 'Up-skirting' (**a criminal offence**) inappropriate photographs of a view up someone's skirt – part of abusive showing of images.

It may include:

- non-consensual sharing of sexual images and videos;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats

The response to a report of sexual violence or sexual harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Records in writing should be made promptly by Bosworth staff to whom allegations are made. This means in **no less than 24 hours** and as soon as possible. Senior staff such as the DSL, her deputies and senior management should inform external agencies such as MASH and the police in the event of such allegations.

Upskirting 'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. *It is now a criminal offence.*

7. DEALING WITH A DISCLOSURE

It is the policy of Bosworth College that a student may speak to any member of staff they wish. Personal Tutors, course directors, boarding house-parents and supervisors (even trained student mentors) are regularly available to talk with students. If a student discloses that he or she has been abused in some way, the member of staff/volunteer should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the student to talk freely
- Reassure the student, but not make promises which it might not be possible to keep
- Never promise a student that they will not tell anyone - as this may ultimately not be in the best interests of the student.
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Report and, if appropriate, sketch on the Safeguarding Form body map any injuries. N.B. Staff should never ask students to let them inspect an injury by removing clothing.
- Listen, only asking questions when necessary to clarify
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make a written record (see Record Keeping)
- Pass the information to the Designated Senior Person without delay and always within 24 hours. Alternatively, if appropriate and always within 24 hours of the disclosure, make a referral to children's social care and/or the police directly (see 6.3 above 'Managing

Concerns or Cases'), and Staff must tell the DSL as soon as possible that they have done so.

8. Concerns about a staff member or volunteer

If Staff have concerns about a member of staff or volunteer, they must speak to the Principal or (in his absence) the DSL.

If Staff have concerns about the Principal, they must speak to the **Chairman of the Advisory Board Michael Spens** without informing the Principal.

The Principal/Chair/DSL will then follow the procedures set out in appendix 3, if appropriate.

The DSL (or Advisory Board Chair in the case of a concern about the Principal) will also inform the designated officer for the local authority. This will occur within 24 hours of the concern being raised.

Where appropriate, the College will inform ISA and the Independent Schools Inspectorate of the allegation and actions taken, within the necessary timescale.

For referrals regarding adults in education and other information on the role of the Designated Officer (formerly LADO) follow the link below:

Local Authority Designated Officers

An allegation is any information which indicates that a member of staff/volunteer may have:

- Behaved in a way that has, or may have harmed a student
- Possibly committed a criminal offence against/related to a student
- Behaved towards a student or students in a way which indicates she/he would pose a risk of harm if they work regularly or closely with students

This applies to any student the member of staff/volunteer has contact within their personal, professional or community life.

In the event of significant harm or allegations of significant harm, the Police must be informed.

What College or college staff should do if they have concerns about safeguarding practices within the College:

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the College or education setting's safeguarding arrangements.
- Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, should be in place for such concerns to be raised with the College or college's senior leadership team. See the Bosworth College Whistleblowing Policy.

If staff members have concerns about another staff member then this should be referred to the Principal. Where there are concerns about the Principal, this should be referred to the Chair of the Advisory Board Michael Spens.

NAME:**CONTACT NUMBER:****Michael Spens****07740 783564**

Where a staff member feels unable to raise an issue with Bosworth or feels that their genuine concerns are not being addressed, allegations should be reported directly to the Designated Officer (formerly LADO). Staff may consider discussing any concerns with the Designated Safeguarding Lead if appropriate making any referral via them.

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. She/he should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality should not be promised, and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words – including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the Principal. The recipient of an allegation must **not** unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

The Principal/Proprietors' delegate will not investigate the allegation itself, nor take written or detailed statements, but will refer the concern to the Designated Officer (formerly LADO):

Multi-Agency Safeguarding Hub: **0300 126 1000 (Option 1)**

For referrals regarding adults in education and other information on the role of the Designated Officer (formerly LADO) follow the link below:

<http://www.northamptonshirescb.org.uk/about-northamptonshire-safeguarding-children-board/who-is-who/designated-officer/>

If the allegation meets any of the three criteria set out at the start of this section, contact should always be made with the Designated Officer (formerly LADO) without delay.

If it is decided that the allegation does not meet the threshold for safeguarding, it will be handed back to the employer for consideration via the College's internal procedures.

The Principal should, as soon as possible and **following briefing** from the Designated Officer, inform the subject of the allegation.

Where a member of staff is dismissed, resigns prior to dismissal or is no longer employed by or invited to the College because of concerns about their suitability to work with children and young people, a written report will be sent to the DBS. This is also the case if a staff member is suspended or

redeployed because of unsuitability to work with young people. Consideration is also given to referring a case to the Teacher Regulation Agency if a teacher is dismissed or resigns prior to dismissal because of unprofessional conduct, conduct that may bring the profession into disrepute or has been convicted of a relevant offence.

In the event that a resident member of staff is suspended from work during investigations of improper conduct or investigations that (s)he is a danger to students, the member of staff will be required to reside off site.

Where a staff member feels unable to raise an issue with their employer/through the whistleblowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- Multi-Agency Safeguarding Hub: **0300 126 1000 (Option 1)**
- NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: **0800 028 0285** – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk

9. SAFER WORKING PRACTICES

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the FAQs and Staff Code of Conduct and Safer Recruitment Consortium document ***Guidance for safer working practice for those working with children and young people in education settings 2019***.

The document seeks to ensure that the responsibilities of College leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. This includes guidelines for staff on positive behaviour management in line with the ban on corporal punishment (**School Standards and Framework Act 1998**). Please see the College's Behaviour Policy and Staff Code of Conduct for more information.

Staff concerned about Bosworth's safeguarding procedures or concerned about safeguarding aspects of Bosworth's policies and procedures should speak with the DSL, The Principal or a member of the Senior Management Team such as the Vice Principal or the Head of Boarding. If they feel the response is unsatisfactory, staff are protected by Bosworth's Whistleblowing Policy if they also pass on their concerns to the Local Authority, or another relevant agency.

10. RECORD KEEPING

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the Designated Safeguarding Lead.

When a child has made a disclosure, the member of staff/volunteer should:

- Record as soon as possible after the conversation. Use the College's Daybook Safeguarding Concern Form
- Do not destroy any original notes in case they are needed by a court
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child
- Draw a diagram to indicate the position of any injuries
- Record statements and observations rather than interpretations or assumptions

All records need to be given to the Designated Safeguarding Lead promptly. No copies should be retained by the member of staff or volunteer.

The Designated Safeguarding Lead will ensure that all safeguarding records are managed in accordance with the Education (Student Information) (England) Regulations 2005 and GDPR.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

We will hold records in line with our records retention schedule.

If a child for whom the College has, or has had, safeguarding concerns moves to another College, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main student file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving College and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

11. CONFIDENTIALITY

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in schools and colleges.

- All staff in schools and colleges, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies (Children's Services and the Police).

- Staff should never promise a student or child that they will not tell anyone about an allegation, as this may not be in the child's best interests
- Staff/volunteers who receive information about students and their families in the course of their work should share that information only within appropriate professional contexts.
- Timely information sharing is essential to effective safeguarding
- Information must only be shared on a 'need-to-know' basis, but you do not need consent to share information if a child or student is suffering, or at risk of, serious harm

12. COLLEGE PROCEDURES

Please see Appendix 3: What to do if you are worried a child is being abused flowchart.

If our staff have any concerns about a student's welfare, they should act on them immediately

If staff have a concern, they should follow this Safeguarding and Child Protection policy and speak to the DSL (or deputy).

Options will then include:

- managing any support for the student internally via the College or college's own pastoral support processes;
- an early help assessment;
- a referral for statutory services, for example as the student might be in need, is in need or suffering or likely to suffer harm.

The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children's social care. In these circumstances, any action taken should be shared with the designated safeguarding lead (or deputy) as soon as is practically possible.

Bosworth staff should not assume a colleague or another professional will take action and share information that might be critical in keeping students safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

If a **teacher** (persons employed or engaged to carry out teaching work at schools, colleges and other institutions in England), in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 **the teacher must report** this to the police after informing the Designated Safeguarding Lead. **This is a mandatory reporting duty.** See Appendix 1- Keeping Children Safe in Education (DfE 2019): Annex A for further details. Bosworth expects any and all members of staff, including non-teaching staff to report such a suspicion in the same way.

The member of staff must record information regarding the concerns on the same day. The recording must be a clear, precise, factual account of the observations. Particular attention will be paid to the attendance and development of any child about whom the College has concerns, or who has been identified as being the subject of a child protection plan and a written record will be kept.

If a student who is/or has been the subject of a child protection plan changes school or college, the Designated Safeguarding Lead will inform the social worker responsible for the case and transfer the appropriate records to the Designated Safeguarding Lead at the receiving College, in a secure manner, and separate from the student's academic file.

The Designated Safeguarding Lead is responsible for making the senior leadership team aware of trends in behaviour that may affect student welfare. If necessary, training will be arranged.

13. COMMUNICATION WITH PARENTS/CARERS

Bosworth Independent College will ensure the Safeguarding and Child Protection Policy is available publicly either via the College website (or by other means, if needed).

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally arrange this in consultation with senior staff in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

14. STUDENTS KEEPING THEMSELVES SAFE

In PHSE teaching, in subject specific lessons, in student – Personal Tutor and in student – boarding staff contact, Bosworth College aims to teach students how to keep themselves safe. This is focused on students keeping themselves safe online but also covers areas such as travel, personal security and dealing with inappropriate friendship or contact that might constitute grooming.

15. VISITORS, OUTSIDE SPEAKERS & STAFF EXTERNAL TO THE COLLEGE

All visitors to Bosworth College (including visiting speakers) are registered on arrival and departure, supervised and wear a lanyard. Visiting speakers (by whomever they are invited) are checked as suitable: their visit must be notified to and approved by the DSL in advance.

The suitability of staff working with Bosworth students who are external to the College (e.g. staff at local sports centres) is checked with the organisation concerned.

17. USEFUL LINKS

NLSP ([Link for the Northamptonshire Safeguarding Children Partnership website](#))
NLSP Colleges ([Link for the Northamptonshire Safeguarding Children Partnership guidance for staff In education](#))

NSPCC 0808 800 5000
Childline: 0800 1111
Child Exploitation and Online Protection (CEOP): 0870 000 3344
Online safety training and advice contact: Onlinesafety@northamptonshire.gov.uk
Online safety policy examples: [Online safety policy examples](#)
Inspecting Safeguarding In the Early Years August 2018: [Inspecting-safeguarding-in-early-years-education-and-skills](#)
Early Years Foundation Stage Statutory Framework: [Early Years Foundation Stage Statutory Framework](#)

18. Implementation, Monitoring and Review of the Safeguarding & Child Protection Policy

The policy will be reviewed annually by the Proprietors & Senior Leadership Team. It will be implemented through the College's induction and training programme, and as part of day to day practice. Compliance with the policy will be monitored by the Designated Safeguarding Lead and through staff performance measures.

APPENDIX 1: KEEPING CHILDREN SAFE IN EDUCATION (DfE 2019)

Part One: Information for all school and college staff

Annex A: Further information

KEEPING CHILDREN SAFE IN EDUCATION (DfE 2019)

KCSIE 2019 Part 1

It is essential that all staff have access to this online document and read Part 1 and Annex A, which provides further information on:

- Children and the court system
- Children missing from education
- Children with family members in prison
- Child sexual exploitation
- Child criminal exploitation: county lines
- Domestic abuse
- Homelessness
- So-called 'honour-based' violence
- Preventing radicalisation
- Peer on peer abuse
- Sexual violence and sexual harassment between children in Colleges and colleges including upskirting

This is to assist staff to understand and discharge their role and responsibilities as set out in this guidance.

As recommended according to good practice, staff are asked to sign to say they have read these sections (please see Appendix 2) and should subsequently be re-directed to these online documents again should any changes occur. Bosworth College checks staff awareness of KCSIE 2019 part 1 by quizzes, questionnaires or other appropriate ways.

APPENDIX 2: DECLARATION FOR STAFF

Child Protection Policy and Keeping Children Safe in Education (DfE 2019)

Bosworth Independent College Academic Year 2019 – 20

Please sign and return to Karen Inman via Nazareth Reception by Friday 27th September 2019.

I, _____ **<insert name>** have read and am familiar with the contents of the following documents and understand my role and responsibilities as set out in these document(s):

- (1) The College's Safeguarding & Child Protection Policy
- (2) **Part 1 and Annex A** of 'Keeping Children Safe in Education' DfE Guidance, 2019

I am aware that the DSLs are:

DSL: KAREN INMAN

DEPUTY DSLs: STEVE O'HARE KEVIN JONES CRAIG WILSON

and I am able to discuss any concerns that I may have with them.

I know that further guidance, together with copies of the policies mentioned above, are available on Bosworth College's Firefly, from Reception in Nazareth House, on the staff room Safeguarding Noticeboards and from the DSL (Karen Inman) or the Deputy Designated Safeguarding Leads – Steve O'Hare, Kevin Jones and Craig Wilson.

Signed _____ Date _____

APPENDIX 3: WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED: ADVICE FOR PRACTITIONERS (DfE 2015)

Flowchart

Be alert

- Be aware of the signs of abuse and neglect
- Identify concerns early to prevent escalation.
- Know what systems the school have in place regarding support for safeguarding e.g. induction training , staff behaviour policy / code of conduct and the role of the Designated Safeguarding Lead (DSL).

Question behaviours

- Talk and listen to the views of children, be non - judgemental.
- Observe any change in behaviours and question any unexplained marks / injuries
- To raise concerns about poor or unsafe practice, refer to the Principal. If the concerns are about the Principal, report to Michael Spens michaelspens549@gmail.com Utilise whistleblowing procedure.

Ask for help

- Record and share information appropriately with regard to confidentiality.
- If staff members have concerns, raise these with the College's Designated Safeguarding Lead (DSL), Karen Inman.
- Take appropriate action. Do not delay.

Refer

- DSL will make referrals to children services but in an emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to MASH on 0300 126 1000 (Option 1)

Information on how to report or whom staff can contact about a concern at **Bosworth Independent College**.

SAFEGUARDING AT BOSWORTH

**Staff to contact immediately with
any concern for a student**



KAREN INMAN – 07523 077604
DESIGNATED SAFEGUARDING LEAD
karen.inman@bosworthcollege.com



STEVE O'HARE – Head of Boarding – 07980 308348
DEPUTY DESIGNATED SAFEGUARDING LEAD
steve.ohare@bosworthcollege.com



KEVIN JONES – Vice Principal – 07780 474037
DEPUTY DESIGNATED SAFEGUARDING LEAD
kevin.jones@bosworthcollege.com



CRAIG WILSON – Principal – 07860 407641
DEPUTY DESIGNATED SAFEGUARDING LEAD
craig.wilson@bosworthcollege.com



CAROLINE ADAMS
COLLEGE NURSE
caroline.adams@bosworthcollege.com



WHAT TO DO IF YOU HAVE A SAFEGUARDING CONCERN:

For concerns about students:

- Contact the Designated Safeguarding Lead for Bosworth College – Karen Inman
- If not available, contact a Deputy Designated Safeguarding Leads – Steve O’Hare, Kevin Jones or Craig Wilson

OR

- NSPCC Tel: 0800 028 0285 or email help@nspcc.org.uk
- Northamptonshire Safeguarding Children Partnership (NSCP) Tel: 01604 364036 nscp@northamptonshire.gov.uk
- Multi Agency Safeguarding Hub (MASH) for referrals and advice Tel: 0300 126 1000
mash@northamptonshire.gcsx.gov.uk

For concerns about staff

- Contact the Principal – Craig Wilson

OR

- Northampton Designated Officer (Formerly LADO) Tel: 01604 367862/362633
 - AndSmith@childrenfirstnorthamptonshire.co.uk
 - CYork@childrenfirstnorthamptonshire.co.uk
- OFSTED Tel: 0300 123 1231

Updated by K Inman January 2020



SAFEGUARDING AT BOSWORTH



How to report any concern for a student

- 1. Do so promptly – always within 24 hours of what makes you concerned. Emergency? Call Karen, Steve or Kevin by mobile. 24/7.**
 - 2. You can report in private conversation, but a written record is necessary. Use an Engage Safeguarding Concern Form or an email.**
 - 3. Engage Safeguarding Concern Forms are efficient, secure and will reach the right people (Karen – DSL, Nurse Caroline, Craig, Steve – Head of Boarding and Kevin).**
- Find them on the Staff Portal in the list with Concern Forms, Discipline Forms, Merit Forms etc.
 - Safeguarding Concern Forms are secure. Once saved, only the Safeguarding Cttee see them.
 - No one will criticise you for over-reacting. Fill one in!
 - Not filling one in may mean the chance to help a student is lost OR there may be abuse during the delay.
 - Remember you can do them from home/outside Bosworth.



Thank you!

APPENDIX 4: INDICATORS OF ABUSE AND NEGLECT

In considering abuse, staff need to remember that abuse does not only occur through physical contact between the victim or victims and one or more abusers. Abuse can occur wholly online. Abuse can be set up online with technology used to enable offline abuse.

Types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child 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
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child 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 children.

Sexual abuse of children by children occurs and staff working with children and young people must be aware of this possibility.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The framework for understanding children's needs:



In addition to the above, from Working Together to Safeguard Children (DfE 2018), refer to the latest Thresholds and Pathways document: [Northamptonshire Thresholds and Pathways](#)

Appendix 5: Specific safeguarding issues from KCSIE 2019 Annex A (p78).

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

Bosworth staff looking after students involved with the court system will receive appropriate training organised by the DSL and the Pastoral Committee. They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their College or college's unauthorised absence and children missing from education procedures.

Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes (including poverty, stigma, isolation and poor mental health). NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child Sexual Exploitation (CSE)

The sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people, (or a third person or persons) receive something, (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) as a result of them performing and/or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect,

physical strength and/or economic or other resources. Violence, coercion and intimidations are common, involvement in exploitative relationships being characterised in the main by the child's or young person's limited availability of choice, resulting from their social/economic and/or emotional vulnerability. (DCSF 2009).

Key Facts about CSE

- Sexual exploitation often starts around the age of 10 years old. Girls are usually targeted from age 10 and boys from age 8.
- It affects both girls and boys and can happen in all communities.
- Any person can be targeted but there are some particularly vulnerable groups: Looked after Children, Children Leaving Care and Children with Disabilities.
- Victims of CSE may also be trafficked (locally, nationally and internationally).
- Over 70% of adults involved in prostitution were sexually exploited as children or teenagers.

Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16. That is approximately 2 million children.

Good practice – Individuals

- Recognise the symptoms and distinguish them from other forms of abuse
- Treat the child/young person as a victim of abuse
- Understand the perspective/behaviour of the child/young person and be patient with them
- Help the child/young person to recognise that they are being exploited
- Collate as much information as possible
- Share information with other agencies and seek advice/refer to Social Care

Good practice – Organisations

- Ensure robust safeguarding policies and procedures are in place which cover CSE
- Promote and engage in effective multi-agency working to prevent abuse
- Work to help victims move out of exploitation
- Cooperate to enable successful investigations and prosecutions of perpetrators

Child Criminal Exploitation: County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism¹² should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;

- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Domestic Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases College and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year olds could be living independently from their parents or

guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16- and 17-year olds who may be homeless and/ or require accommodation.

So-called 'honour-based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Actions

If staff have a concern regarding a child that might be at risk of HBV or who has suffered from HBV, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers** that requires a different approach (see following section).

Female Genital Mutilation FGM

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures.

FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

Other than in the excepted circumstances, it is an offence for **any person (regardless of their nationality or residence status)** to:

- perform FGM in England, Wales or Northern Ireland (section 1 of the Act);
 - assist a girl to carry out FGM on herself in England, Wales or Northern Ireland (section 2 of the Act); and
 - Assist (from England, Wales or Northern Ireland) a non-UK person to carry out FGM outside the UK on a **UK national or permanent UK resident** (section 3 of the Act).
- Advice can be found at the national FGM helpline on **0800 028 3550**

Forced Marriage (FM)

FM is now a specific offence under section 121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014.

A FM is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

FM is illegal in England and Wales. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)

Prevent & anti-radicalisation

The Counter Terrorism & Security Act 2015

The Act places a Prevent duty on specified colleges and schools to have "due regard to the need to prevent people from being drawn into terrorism". The education and childcare specified authorities in Schedule 6 to the Act are as follows:

- The proprietors of maintained Colleges, non-maintained special Colleges, maintained nursery Colleges, independent Colleges (including academies and free Colleges) and alternative provision academies, PRUs, registered early years providers, registered late years providers and some holiday schemes.

Colleges/settings like Bosworth subject to the Prevent Duty will be expected to demonstrate activity in the following areas –

- Assessing the risk of children being drawn into terrorism or being radicalised into accepting extremist viewpoints through distorted presentation or through abusive means.
- Demonstrate that they are protecting children and young people from being drawn into terrorism by having robust safeguarding policies.
- Equipping students to be critical of extremist viewpoints by teaching them Fundamental British Values such as tolerance, equality, respect, freedom of speech and human dignity.
- Ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board.
- Make sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism or of being radicalised, and to challenge extremist ideas which can be used to legitimise terrorism

- Expected to ensure children are safe from terrorist and extremist material when accessing the internet in College
- Seeking specialist support if necessary, e.g. through Northamptonshire Police at email prevent@northants.pnn.police.uk or phone 101 then ext 341166)

Gangs and youth violence

Certain geographical settings have a culture of gangs into which students of different ages can be recruited. These cultures lead to and make use of physical, sexual and emotional abuse. This can be through initiation rites, peer on peer physical and sexual abuse, intimidation, racial and sexist abuse. Schools and Colleges are required to ensure students feel safe at school all the time; understand very clearly what unsafe situations are; and are highly aware of how to keep themselves and others safe. Students must show respect for each other and each other's views and lifestyle. Bosworth staff are expected to be aware of and raise as urgent safeguarding concerns signs of gang culture affecting students: peer on peer violence, racism or exclusivism, isolation and bullying of students or groups of students, information about students' lives outside College such as fighting or possession of knives. Bosworth staff know to notify the DSL and senior staff within 24 hours of a concern so that help may be sought from such experts as MASH, local authority youthwork teams, community police or the NSPCC.

Online safety and use of electronic equipment by students

Bosworth College has an online safety policy, whilst the DSL also acts as Online Safety Officer. Staff safeguarding training includes online safety for students. Online safety forms a part at least annually of SMSC and PHSE for all year groups. Filtering software blocks access to inappropriate sites for students and staff and provides a record of when inappropriate sites are accessed via any part of Bosworth's information technology system. Such reports are monitored by Bosworth's ICT support team (Magma Co.) and passed to the DSL.

Sexting in Colleges

<https://Colleges.oxfordshire.gov.uk/cms/sites/Colleges/files/folders/folders/documents/safeguarding/SextingResourcePack.pdf>

Role of the designated safeguarding lead

Governing bodies, proprietors and management committees should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead.¹¹⁴ The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Appendix 7: Quick reference pyramid for raising concerns at Bosworth



Kevin Jones and Karen Inman (DSL) 20th January 2020

For review July 2020