



# Safeguarding and Child Protection Policy & Procedure

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Guardianship Organisation

BOSSS (UK) Limited

June 2022

V1.5



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## 1. Our commitment to safeguarding

The purpose of the BOSSS UK Safeguarding Policy and its associated documents is to:

- 1.1 Provide protection for every child who is under its guardianship and care is safe and protected from harm and;
- 1.2 Provide students, staff and host families with guidance on procedures they should adopt in the event that they suspect a student may be experiencing, or be at risk of, harm

This means we will always work to:

- ✓ Protect children and young people in our care from maltreatment. All students, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- ✓ Prevent impairment of our children's and young people's mental or physical health or development;
- ✓ Ensure that children and young people in our care grow up in circumstances consistent with the provision of safe and effective care;
- ✓ BOSSS UK's commitment is further formalised in our safeguarding policy document, which has taken the following guidance from HM Government and procedures into consideration:
  - Keeping Children Safe in Education guidance
  - Working together to Safeguard Children, March 2018
  - Child Protection Group
- ✓ This policy should be read alongside the above-mentioned guidance and:
  - Statutory guidance Working Together to Safeguard Children
  - Departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners
  - Departmental advice Sexual Violence and Sexual Harassment Between Children in Schools and Colleges

1.3 This policy applies to all students, staff, host families and anyone working on behalf of BOSSS UK.

1.4 KCSIE now applies to providers of post 16 education

1.5 as set out Education and Training (Welfare of Children) Act

1.6 2021

1.7 Our Policy documents will be discussed with our staff, homestays and students in order to ensure that the content is understood.



## 2. Safeguarding and Child Protection

- 2.1 BOSSS UK acknowledges the duty of care to safeguard and promote the welfare of all children in its care involved in school and leisure activities and to comply with the UK child protection laws and adherence to the UN convention on the Rights of the Child, 1989. We are committed to protecting the children in our care from physical, emotional or sexual abuse or neglect.
- 2.2 The aim of our Child Protection Policy is to promote good practice by:
- 2.3 Providing children and young people with appropriate safety and protection whilst in the care of the BOSSS UK;
- 2.4 Ensuring that all guardianship personnel is informed and aware of their responsibilities to act on any concerns of signs of abuse, neglect and other safeguarding issues relating to children and young people by contacting the appropriate authorities;
- 2.5 Ensuring that all guardianship personnel and Host Families are recruited according to safe recruitment practices and formally screened through the completion of an Enhanced Disclosure and Barring Service check;
- 2.6 Promoting an environment of trust and open communication between students, school, BOSSS UK personnel and BOSSS UK Host Families, in order to recognise students' safety and pastoral care the top priority.
- 2.7 Responding to any child abuse allegations or suspicions in accordance with the guidelines of the Association for the Education and Guardianship of International Students (AEGIS);
- 2.8 Having a Designated Safeguarding Lead (DSL) for child protection as well as having a Deputy Designated Safeguarding Lead (DDSL). The Designated Safeguarding Lead's responsibility is to:
- 2.8.1 Act as the first point of contact for Host Families, Parents, Students and the Guardianship Organisation's staff.
- 2.8.2 Liaising, as necessary, with the relevant Local Authority Designated Officer, appointed by the Social Services Department, as well as with the Designated Officer appointed by the School or College attended by the Student.
- 2.9 Having a Prevent Lead for child protection as well as having a Deputy Prevent Lead. The Prevent Lead's responsibility is to:
- 2.9.1 Act as the first point of contact if a child has been identified who may be vulnerable to radicalisation, and know what to do when they are identified.
- 2.9.2 To protect children from the risk of radicalisation as part of their safeguarding duties
- 2.10 Designated Safeguarding Lead (DSL) and Prevent Lead full contact details
- 2.10.1 Designated Safeguarding Lead (DSL) and emergency contact details:



Name: Tina Wong  
Email: info@bosssguardians.com  
Contact number (24 hour emergency): +44 (0)777 6206352

2.10.2 Deputy Designated Safeguarding Lead (DSL) and emergency contact details:

Name: Candy Lam  
Email: info@bosssguardians.com  
Contact number (24 hour emergency): +44 (0)7922 152628

## 2.11 Liaison with the Local Safeguarding Partnership (LSP)

2.11.1 The LSP is a multi-agency body set up in every local authority. Each LSP has an independent Chair, that is, someone who doesn't work for social services. However the Chair will work closely with the Director of Children's Services. The role of the LSP is to:

2.1.1.1 Coordinate what is done by everyone on the LSP to safeguard and promote the welfare of children in the area make sure that each organisation acts effectively when they are doing this.

2.1.1.2 The LSP publishes policies and procedures for child protection in their area.

2.11.4 Multi-agency working: New safeguarding partners and child death review partner arrangements are now in place. Locally, the three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs.

2.11.5 It is especially important that the GO understand their role in the three safeguarding partner arrangements. Governing bodies, proprietors and their senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow their local arrangements.

2.11.6 The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- When to call the police should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

2.11.7 BOSSS UK is aware of how to access local agency contacts. This includes referrals to Multi Agency Safeguarding Hubs (MASH) and Local Safeguarding and Children's Boards (LSP) across the country, how to access locally agreed inter-agency procedures, guidance and contact with LSP members.

2.11.8 In addition, the company is aware of the non-emergency reporting procedures via the Local Authority's Children's Services relevant to the area or MASH (via the relevant contact telephone numbers on the internet), or by telephoning 101 to report a non-emergency. For emergency situations, the company is aware of the need to contact the relevant police force for the area by dialling 999.

2.11.9 Dorset LSP Contact Details:



Telephone: 01305 221196  
Email: LADO@bcpcouncil.gov.uk  
Local Area Designated Officer (LADO) on: 01305 221122

#### 2.11.10 Hampshire LSP Contact Details:

Telephone: 01962 876364  
Email: hscb@hants.gov.uk  
Local Area Designated Officer (LADO) contact number: 01962 876364

#### 2.12 Liaison with parents / agents and partner schools

2.13 BOSSS UK keep in regular contact with the student's school, in line with the requirements of the parents. Each partner school has a designed person engaged to liaise with. Information is disseminated to other appropriate individuals within the school. BOSSS UK will check that the information has been cascaded appropriately.

2.14 BOSSS UK also keep in regular contact with parents/agents appropriately. Information regarding the student is disseminated to the parents/agents when appropriate.

### 3. Missing Student

3.1 A missing child could potentially be at risk of abuse or neglect. We are alert to that possibility and will notify all relevant authorities if it is deemed necessary.

3.2 This policy will be provided to all staff and homestays and can be viewed in our Homestay, Parent handbooks and our website [www.bosssuk.co.uk](http://www.bosssuk.co.uk).

3.3 In order to minimise the risk of a child/children becoming lost whilst in care the homestay or school will:

- 3.2.1 Ensure that the student has all relevant contact numbers i.e. the homestay contact numbers (in particular re primary carer), their BOSSS UK student coordinator, the DSL and emergency contact numbers.
- 3.2.2 Ensure the premises is secure and I will take steps to prevent unauthorised persons entering the premises
- 3.2.3 Ensure that the child is supervised closely when in public places are visited such as local parks, museums and shops
- 3.2.4 Ensure your child knows to stay close to me when we are away from the setting, assessing your child's stage of development to ensure the required level of supervision is in place
- 3.2.5 Teach the child about how to keep safe, so they also know the procedure to take should in the unlikely event, they become separated from their chaperone
- 3.2.6 Teach the child about the dangers of wandering off
- 3.2.7 Advise the child what to do if they find themselves lost
- 3.2.8 With parental consent carry an up-to-date photograph of each child in your care
- 3.2.9 Recognise children's age and stage of development of the children to identify a meeting point on arrival at the venue should you get separated



3.4 On discovering that a child has gone missing the homestay or school will:

- 3.3.1 Immediately make a search of the surrounding area
- 3.3.2 Request help from people around you
- 3.3.3 If in a public building, alert the staff of the situation and ask for assistance in searching for the missing child
- 3.3.4 If in a place where it is possible to seal off exits and access CCTV, then you will request that this is done immediately
- 3.3.5 People involved in the search will be given a description of the child and what the child is wearing
- 3.3.6 Reassure the other children in my care (if any), as this could become a distressing situation for them.
- 3.3.7 A suggested timeline is as follows, it is important to note that this is not a strict protocol, but a guideline for the staff or homestay on how to respond. It is recognised that timings may vary in each case.

0 minutes: Indicated return time, e.g. agreed time to return for meal time

0 – 1 hour: 'Late return' noted by staff or homestay. Try to establish whereabouts of the student by trying to contact them by mobile phone and if not successful speaking to their friends (if known).

1 – 2 hours: 'Not returned' if still unable to contact the student, the staff or homestay should seek to make contact with the DSL and check for any planned trips, conduct a basic room search for evidence of reason for being absent, etc. If for any reason there has been a delay in the absence being discovered, the timescale should be tightened accordingly, but there still needs to be the effort made to ascertain the student's whereabouts, a phone call must be made if there are any concerns about the student's welfare.

3.5 If the search is unsuccessful you must:

- 3.4.1 Ring the police, providing a description and keep searching the area. You do not have to wait 24 hours to report someone as missing. If you have serious concerns for the safety and welfare of a person, and their whereabouts are unknown, then you may immediately report them missing to your local police.
- 3.4.2 Contact the guardianship Designated Safeguarding Lead or Deputy Designated Safeguarding Lead to advise them of the situation within 2 hours.
- 3.4.3 Designated Safeguarding Lead or Deputy Designated Safeguarding Lead to advise the parents of the situation

3.6 In the event a student is identified to be missing the students, staff, volunteers, homestays or school should report the missing students to the DSL or their deputy.



3.7 BOSSS UK recognises the guidance in the Children Missing from Education guidance September 2016 and is particularly relevant to day students. An overview of the guidance:

3.7.1.1 All children, regardless of their circumstances, are entitled to an efficient, full time education, which is suitable to their age, ability, aptitude and any special educational needs they may have.

3.7.1.2 Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

3.7.1.3 Effective information sharing between parents, schools and local authorities is critical to ensuring that all children of compulsory school age are safe and receiving suitable education. Local authorities should focus their resources effectively in intervening early in the lives of vulnerable children to help prevent poor outcomes.

3.7.1.4 Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Being more prone to peer group isolation than other children;
- The potential for children with SEN and disabilities being disproportionately impacted
- By behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.
- To address these additional challenges, we would engage the school to consider extra pastoral support for children with SEN and disabilities and consideration of the most appropriate homestay to support them.

3.7 In the event that a student goes missing:

3.7.2.1 The Missing Student log will be updated with the date of the incident, students name, incident detail, action undertaken, staff member who reviewed the incident, lessons learnt and any action undertaken e.g. required policy updates and communications. This record is kept held electronically on our secure Cloud drive. This drive only accessible by approved members of staff and in line with Data Protection guidelines and laws.

3.7.2.2 A review will be undertaken after the incident and any lessons learnt or actions taken incorporated into policy.





## 4. Safer Staff Recruitment

4.1 BOSSS UK are committed to ensuring all staff recruitment policy and procedures are safe, promote the welfare of children and consider the requirements of Safeguarding and Child Protection. The following guidance from HM Government are also considered:

4.1.1 Keeping Children Safe in Education (all versions to present)

4.1.2 Working together to Safeguard Children, March 2015

4.2 The aim of the policy is to guide those responsible for appointing staff take all possible steps to identify and reject potential employees who could cause harm to a child in our care or unsuited to work with children. BOSSS UK expects all staff to share this commitment.

4.3 This should include, as appropriate:

4.3.1 All applicants will receive fair treatment and staff will be recruited on the knowledge, skills and experience needed for the role. The job description should detail that it would be specifically to working with children, or in a setting where children are present and will promote the safeguarding and promoting the welfare of children.

4.3.2 All staff including the Homestay individuals (age 16 and above) to be in possession of an Enhanced DBS Check with Barring certificate from the Disclosure and Barring Service and be further checked, if appropriate, with Social Services through the Local Safeguarding Children's Board.

4.4 Individuals who have lived or worked outside the UK or never been to the UK must undergo the same checks as all other staff. Checks could include, where available:

4.4.1 Criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions

4.4.2 Obtaining a letter of professional standing from the professional regulating Authority in the country in which the applicant has worked. Advice about which regulatory or professional body applicants should contact is available from the National Recognition Information Centre for the United Kingdom, UK NARIC

4.5 Obtain written permission from all Staff and Homestays for such checks to be undertaken.

4.6 All staff as well as the Primary Carer in the Homestay to have an appropriate level of safeguarding and child protection training.

4.7 All policy, procedures and people are relating to safeguarding and child protection are reviewed annually and/or updated whenever appropriate and that additional relevant training be provided, if and when applicable and annually at the minimum. Changes to policy are shared with key individuals.

4.8 Training is conducted for staff on safer staff recruitment, how to conduct a homestay interview and assessment and what mandatory documents and checks are required.

4.9 As part of recruiting all of our staff and homestays we will:



- 4.9.1 Section 4.9.1 Identification and verification (ID&V) checks performed. Verify a candidate's identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is possible.
- 4.9.2 Complete a Right to Work check
- 4.9.3 Seek approval from the homestay/staff member to perform an Enhanced DBS check on all family member age 16 and over (homestays only).
- 4.9.4 Obtain two references (one professional and one personal) from appropriate individuals who have known the Homestay for over two years (not family members).
- 4.9.5 Verify the source of the reference by performing follow-up telephone calls to both referees must be made and proof of identity (either passport or driving licence) requested from the personal referee. If concerns are raised within the reference, the guardianship organisation is required to address these by telephoning the referee, so any further questions can be asked. A log of the call should be placed on file. The references should be retained on file for the duration of contract/employment and then an agreed period of time afterward, normally 5 -7 years. The guardianship organisation is required to check that information provided in references is not contradictory or incomplete. On receipt, references should be checked to ensure that all specific questions have been answered satisfactorily. The referee should be contacted to provide further clarification as appropriate, for example if the answers are vague or if insufficient information is provided. They should also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies should be taken up with the candidate.
- 4.9.6 In addition to the above checks on our staff, for our homestays we will:
- 4.9.7 Perform a Homestay Interview at the household to assess its suitability and inspect all accommodation. Detailed notes are kept for this interview.
- 4.9.8 Obtain a signed Homestay Self Declaration.
- 4.9.9 Obtain further information from the Homestay, which is reviewed and checked and any discrepancies addressed and the application deemed satisfactory.
- 4.9.10 All Safer Recruitment Checks are held electronically on our secure Cloud drive. This drive only accessible by approved members of staff and in line with Data Protection guidelines and laws.
- 4.9.11 Obtain insurance documentation and Gas Safety Certificate evidence.
- 4.10 Safeguarding and Child Protection Training
  - 4.10.1 Ensure staff read and review the Safeguarding Policy annually or if any updates have been made.
  - 4.10.2 Provide mandatory safeguarding training to all staff and Homestays annually and whenever appropriate. This includes training and guidance on the AEGIS Basic



Homestay Check-List (CL1), which confirms the duties and responsibilities of the Guardianship Organisation and host or homestay families – for full checklist see Appendices B.

- 4.10.3 At least one member of Guardianship Organisation staff will have received safer recruitment training from a recognised provider.
- 4.10.4 BOSSS UK does not have any Private Fostering arrangements.

## 5. Whistleblowing & Low Level Concern Policy

- 5.1 BOSSS UK are committed to being open, honest and accountable to the highest standard. If there has been any wrongdoing in the workplace that a mechanism must be set up to enable staff, partners and volunteer to report their concerns in confidence.
- 5.2 The Public Interest Disclosure Act 1999 protects employees against being dismissed or treated unfairly by their employers if they have publically disclosed serious concerns.
- 5.3 The **whistleblowing policy** aims to assist, encourage and support individuals who wish to report serious concerns that they may have pertaining to and including:
  - 5.3.1 Safeguarding and Child protection wrongdoing or concerns
  - 5.3.2 A criminal offence
  - 5.3.3 Health and safety
  - 5.3.4 Risk or actual damage to the environment
  - 5.3.5 Miscarriage of justice
  - 5.3.6 The company breaking the law
  - 5.3.7 Covering up of any wrong doing
- 5.4 Those wishing to make a disclosure may do so to any member of staff who then must escalate the concern urgently without delay to the Designated Safeguarding Lead or their delegate (see section 2.7.1 and 2.7.2)
- 5.5 In the event of any suspected criminal activity the Designated Safeguarding Lead should inform the police and facilitate the police in their investigation appropriately.
- 5.6 If your concern relates to a safeguarding or child protection wrongdoing, normally you should first raise your concern internally, with our DSL or Deputy DSL. If you feel unable to do this (perhaps because your concern relates to them), you should raise your concern with our senior leadership Betty Stevens without bringing it to the attention of the DSL. If your concern is against senior leadership this should be brought to the attention of the Local Authority Designated Officer (LADO). For Dorset LADO Contact Details: 01305 221196 and email: dorsetLSP@dorsetcc.gov.uk. For Hampshire: 01962 876364 Email: hscb@hants.gov.uk



- 5.7 If your concern relates to the DSL or senior leadership with regard to criminal activity then the police should be informed.
- 5.8 If you are worried at any stage about how to raise your concern, you should always seek independent advice at the earliest opportunity. This may be to check who may be best placed to deal with your concern or simply to talk the matter through in confidence first and discuss how to raise your concern. You can do this through your union or professional body or the independent whistleblowing charity Public Concern at Work on 020 7404 6609, or by email at [whistle@pcaw.org.uk](mailto:whistle@pcaw.org.uk). For further information please see their website at [www.pcaw.co.uk](http://www.pcaw.co.uk). If you decide to seek advice from a legal adviser, then anything you say to them is automatically protected.
- 5.9 If you have raised your concern internally but feel it has not been properly addressed, or if you feel unable to raise your concern at any level, you may feel that you need to raise your concern outside your place of work. It is advisable, in terms of both addressing the concern and securing your own protection as a whistleblower, to do this first with the body that has some oversight of the work of your employer. This may be a governing body, the local authority, a funding agency or a national regulator.
- 5.10 If your concern is about an immediate or current risk to an individual child or children, it is important that you follow the child protection procedures that apply to the local authority.
- 5.11 If you approach Ofsted with a concern about child protection, they will always refer it to the appropriate authority, as Ofsted does not have any statutory powers to directly investigate or intervene in individual cases. You can find advice on reporting child protection risks at: [www.gov.uk/government/publications/keeping-children-safe-in-education](http://www.gov.uk/government/publications/keeping-children-safe-in-education).
- 5.12 This web link is intended to provide support for professionals who work within educational settings. However, it also offers valuable advice and links helpful to members of the general public. More general advice is also available from the NSPCC, via their Helpline (0808 800 5000) or website [www.nspcc.org.uk/help-and-advice/worried-about-a-child/are-you-worried-hub\\_wdh72939.html](http://www.nspcc.org.uk/help-and-advice/worried-about-a-child/are-you-worried-hub_wdh72939.html)
- 5.13 The Designated Safeguarding Lead has a responsibility to ensure that:
- 5.13.1 They listen to the concern and decide if any action is needed.
  - 5.13.2 Asked for further information appropriately.
  - 5.13.3 To establish if the concern is confidential and if the individual wishes to remain anonymous.
  - 5.13.4 Keep the individual informed about the action they've taken, keeping in consideration the level of detail which can be disclosed which is dependant on the whether the confidentiality of other people must be met.
  - 5.13.5 All staff comply with this policy
- 5.14 Investigating procedure
- 5.14.1 The Designated Safeguarding Lead or their delegate should obtain and document full



details of the concern. This will be performed in writing and provided to the individual making the complaint and retained as evidence.

- 5.14.2 If the concern is a Safeguarding or Child Protection issue the DSL must not investigate in any way but must inform the LADO and follow their instructions. Only the Police and LADO can investigate in a CP case.
  - 5.14.3 If appropriate, the member of staff against whom the complaint has been made should be informed of the complaint and their right to be accompanied by an appropriate representative at any future interview or hearing.
  - 5.14.4 Allegations should be fully investigated with assistance of other individuals the police or other bodies where appropriate.
  - 5.14.5 A decision regarding the validity of the concern will be made by the investigating Designated Safeguarding Lead including appropriate action to take.
  - 5.14.6 The investigations and rationale for the decision will be documented in a written report. This will be shared with
  - 5.14.7 If appropriate a disciplinary will be raised and company procedure followed.
  - 5.14.8 The individual who raised the concern should be kept informed of the progress and final decision if appropriate.
  - 5.14.9 If the individual is not satisfied with the how the concern was dealt with they may communicate this to another member of staff (eg a more senior member of staff) or a prescribed person or body
- 5.15 NSPCC Whistleblowing Helpline
- 5.15.1 The NSPCC have a whistleblowing helpline, which is available for staff who do not feel able to raise concerns regarding child protection failures within the organisation. Staff can call 0800 028 0285 between 8am and 8pm Monday to Friday or can email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
  - 5.15.2 The Whistleblowing Advice Line offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation.
  - 5.15.3 Protect provide a free, confidential advice line for concerned staff to call before whistleblowing. The helpline is 020 3117 2520 and their website is: [www.pcaw.co.uk](http://www.pcaw.co.uk).
- 5.16 The **Low-Level Concern Policy** aim is to create a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable the GO to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the GO are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the GO.



- 5.17 Low-Level Concerns operate in conjunction with BOSSS' suite of safeguarding and company policies. Here we introduce the concept and importance of sharing low-level concerns:
- 5.17.1 Behaviour which is not consistent with the standards and values of our GO, and which does not meet our expectations encapsulated in our Safeguarding and Child Protection Policy, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.
  - 5.17.2 All staff and homestays need to be informed about and be able to identify concerning, problematic or inappropriate behaviour and understand the importance of sharing concerns when they observe behaviour which violates our Staff & Homestay Code of Conduct.
- 5.18 The **Low-Level Concerns Policy** enables all staff and homestays to share any concerns, no matter how small about their own or another member of staff's behaviour with DSL or their deputy. We do this to create and embed a culture of openness, trust and transparency.
- 5.19 The policy applies to all staff whether working in or on behalf of the GO and volunteers.
- 5.20 This enables staff and homestays to report any allegation that may meet not meet the harm threshold noted below. The term 'allegation' means it is alleged that an adult who works with children has:
- 5.20.1 Behaved in a way that has harmed a child, or may have harmed a child; and/or
  - 5.20.2 Possibly committed a criminal offence against or related to a child; and/or
  - 5.20.3 Behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or
  - 5.20.4 Behaved or may have behaved in a way that indicates they may not be suitable to work with children. In terms of managing cases of allegations that may meet the harm threshold, these might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children.
- 5.21 In terms of managing cases of allegations that may meet the harm threshold, these might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children.
- 5.22 Concern (including an allegation) that does not meet the harm threshold – i.e. a low-level concern. The term 'low-level concern' does not mean that it is insignificant, it means that an adult's behaviour towards a child does not meet the harm threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:
- 5.22.1 Is inconsistent with the GO Staff & Homestay Code of Conduct, including inappropriate conduct outside of work; and
  - 5.22.2 Does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking



advice from the LADO, and on a no-names basis if necessary.

- 5.23 It is important that low-level concerns are shared with the DSL or their deputy as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) – although it is never too late to share a low-level concern. Where the concern has been shared with the DSL he will inform the Managing Director as soon as practicably possible.
- 5.24 If any low-level concern relates to the behaviour of the DSL or their deputy, it should be referred to the Managing Director or the Compliance Officer, unless there is conflict of interest in doing so, in which case it should be reported directly to the LADO.
- 5.25 The concern can be shared verbally in the first instance, or a written summary of it can be provided to them via email. Where the low-level concern is provided verbally, the DSL or their deputy will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion and will exercise sound professional judgment in determining what information is necessary to record for safeguarding purposes.
- 5.26 Once the has received the low-level concern, they will – not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them:
- 5.27 Once a low-level concern is received, the DSL or their deputy will
- 5.27.1 Speak to the person who raised the low-level concern (unless it has been raised anonymously).
  - 5.27.2 Speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
  - 5.27.3 Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
  - 5.27.4 If they are in any doubt, seek advice from the LADO – on a no-names basis if necessary.
- 5.28 The DSL will review the information and determine whether the behaviour in question:
- 5.28.1 Is entirely consistent with the GO's Staff & Homestay Code of Conduct and the law
  - 5.28.2 Constitutes a low-level concern
  - 5.28.3 Is not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary
  - 5.28.4 When considered with any other low-level concerns previously raised about the same person, could now meet the threshold of an allegation, and should be referred to the LADO/other relevant external agencies, and in accordance with the GO's Safeguarding Policy.



- 5.29 The DSL or their deputy will
- 5.29.1 Ensure that appropriate and detailed records are kept of all internal and external conversations regarding the concern, their determination, the rationale for their decision and any actions taken, and retain records in accordance with the Low-Level Concerns Policy.
- 5.30 If it is determined that the behaviour is entirely consistent with the GO Staff & Homestay Code of Conduct and the law, the DSL will
- 5.30.1 Update the individual in question and inform them of any action taken (as above).
  - 5.30.2 Speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the GO's Staff & Homestay's Code of Conduct and the law.
- 5.31 If it is determined that the behaviour constitutes a low-level concern is entirely consistent with the GO Staff & Homestay Code of Conduct and the law, the DSL or their deputy will
- 5.31.1 Respond in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively, whilst on the other hand protecting staff from any potential false allegations or misunderstandings.
  - 5.31.2 Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.
  - 5.31.3 Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.
  - 5.31.4 Any such conversation with individuals in these circumstances will include being clear with them as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.





## 6. Confidentiality and Information Sharing

### 6.1 Confidentiality

- 6.1.1 Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. It is a key factor identified in many serious case reviews (SCRs), where poor information sharing has resulted in missed opportunities to take action that keeps children and young people safe.
- 6.1.2 If information collection and sharing is to take place with the consent of the individuals involved, providing they are clearly informed about the purpose of the sharing, there should be no breach of confidentiality or breach of the Human Rights Act 1998. If the information is confidential, and the consent of the information subject is not gained, then practitioners need to decide whether there are grounds to share the information without consent. This can be because it is overwhelmingly in the information subject's interests for this information to be disclosed. It is also possible that a public interest would justify disclosure of the information (or that sharing is required by a court order, other legal obligation or statutory exemption).
- 6.1.3 In the context of safeguarding a child or young person, where the child's welfare is paramount, it is possible that the common law duty of confidence can be overcome. Practitioners must consider this on a case-by-case basis. As is the case for all information processing, initial thought needs to be given as to whether the objective can be achieved by limiting the amount of information shared – does all of the personal information need to be shared to achieve the objective?
- 6.1.4 All child protection or safeguarding records deemed to be confidential, disclosure will be allowed only to those who will need the information to safeguard and ensure the welfare of the children.
- 6.1.5 The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records should include:
- a clear and comprehensive summary of the concern;
  - details of how the concern was followed up and resolved;
  - a note of any action taken, decisions reached and the outcome.
- 6.1.6 They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.
- 6.1.7 BOSSS UK will co-operate with police and social services in order to share the relevant information related to child protection investigations under section 47 of the Children Act 1989.



## 6.2 Data Protection

- 6.2.1 BOSSS UK staff will have access to personal confidential information that we collect on host families, students, overseas parents and other staff members. This information is gathered in order to enable it to provide a guardianship service and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that BOSSS UK Guardians complies with its statutory obligations.
- 6.2.2 The GO should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:
  - 6.2.3 Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
  - 6.2.4 Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

6.3 The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

- 6.3.1 BOSSS UK is registered with the Information Commissioners Office (ICO) and information will be stored and processed in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 25 May 2018 and the Data Protection Act (DPA) 2018. Our registration reference is ZA139160.
- 6.3.2 The EU GDPR replaces the Data Protection Directive 95/46/EC and was designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens data privacy and to reshape the way organizations across the region approach data privacy.
- 6.3.3 The DPA 2018 came into force on 25th May 2018 and replaces the DPA 1998.
- 6.3.4 Everyone responsible for using data will follow the 'data protection principles' to make sure that the information is:
  - 6.3.4.1 Used fairly and lawfully
  - 6.3.4.2 Used for limited, specifically stated purposes
  - 6.3.4.3 Used in a way that is adequate, relevant and not excessive
  - 6.3.4.4 Accurate



6.3.4.5 Kept for no longer than is absolutely necessary

6.3.4.6 Handled according to people's data protection rights

6.3.4.7 Kept safe and secure

6.3.4.8 Not transferred outside the European Economic Area without adequate protection

#### 6.4 Information Sharing

6.4.1 BOSSS UK recognises that Information sharing is vital to safeguarding and promoting the welfare of children and young people. A key factor identified in many serious case reviews (SCRs) has been a failure by practitioners to record information, to share it, to understand its significance and then take appropriate action.

6.4.2 BOSSS UK recognise the guidance from HM Government documents 'Information Sharing' 2018 and 'Working Together to Safeguard Children' 2020 and abide by the 'Seven Golden Rules to sharing Information'.

- i. Remember that the Data Protection Act 1998 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
- ii. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- iii. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- iv. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.
- v. Consider safety and well being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- vi. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
- vii. Keep a record of your decision and the reasons for it – whether it is to share



information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## 6.5 Record Keeping

- 6.5.1 BOSSS UK The School recognises that by efficiently managing its Safeguarding records, it will be able to comply with its legal and regulatory obligations and to contribute to the effective overall management of the Guardianship Organisation (GO). Records provide evidence for protecting the legal rights and interests of the GO, its overseas parents, students, staff, homestays also our partner schools and provide evidence for demonstrating performance and accountability. This document provides the policy framework through which this effective management can be achieved and audited.
- 6.5.2 This policy applies to all records that are created, received or maintained by staff of the GO in the course of carrying out its functions.
- 6.5.3 Records are defined as all those documents which facilitate the business carried out by the GO and which are thereafter retained (for a set period) to provide evidence of its transactions or activities. These records may be created or received, dated and then stored, in hard copy at our head office or electronically on a secure cloud based drive only accessible by BOSSS UK Staff, in line with data protection requirements.
- 6.5.4 Individual staff and employees must ensure that records for which they are responsible are accurate, and are maintained and disposed of in accordance with the GOs record keeping guidelines.
- 6.5.5 All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.
- 6.5.6 Records should include:
  - 6.5.7 a clear and comprehensive summary of the concern;
  - 6.5.8 details of how the concern was followed up and resolved;
  - 6.5.9 a note of any action taken, decisions reached and the outcome.
  - 6.5.10 If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

## 6.6 Data Protection Toolkit

Further details on information sharing can be found:

- 6.6.1 In Chapter one of Working Together to Safeguard Children, which includes a myth-busting guide to information sharing
- 6.6.2 At Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing



information will be especially useful

- 6.6.3 At The Information Commissioner's Office (ICO), which includes ICO GDPR FAQs and guidance from the department
- 6.6.4 In Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR.

## 6 Bullying including Cyber Bullying

6.5 BOSSS UK is committed to safeguarding its students from bullying. We promote a caring, friendly and safe environment for all of our students so they can learn in a relaxed and secure atmosphere.

6.6 What is bullying? Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages, social media or gaming, which can include the use of images and video) and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, special educational needs or disabilities, or because a child is adopted, in care or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

6.7 Bullying can be expressed in many ways, the most common are:

- 6.7.1 Emotional: Being unfriendly, excluding, tormenting
- 6.7.2 Physical: Pushing, kicking hitting or any use of violence
- 6.7.3 Racist: Racial taunts gestures
- 6.7.4 Sexual: Unwanted physical contact or sexually abusive comments
- 6.7.5 Verbal: Name calling, teasing
- 6.7.6 Cyber: All areas of the Internet, such as emailing, text messaging (see section 8.4)

6.8 A child will often indicate signs that suggest that he or she is being bullied. The most obvious of which are:

- 6.8.1 Unwilling to go to school
- 6.8.2 Becomes withdrawn, anxious and lacking in confidence
- 6.8.3 Begins to do poorly at school
- 6.8.4 Has possession's, which are damaged or "go missing"
- 6.8.5 Has unexplained cuts and bruises



- 6.8.6 Becomes aggressive, disruptive or unreasonable
  - 6.8.7 Eating habits change or stops eating
  - 6.8.8 Cries themselves to sleep or has nightmares
  - 6.8.9 Is frightened to say what is wrong
- 6.9 It is essential that all students and homestays to understand the different forms of bullying and the common signs. If they observe any of these signs themselves or in any others that could indicate that bullying could be occurring and therefore should be investigated.
- 6.10 Bullying procedure and guidelines:
- 6.10.1 All incidents of bullying or suspected bullying should be reported immediately to the DSL or their deputy. It is the responsibility of the DSL to investigate the bullying behaviour to ensure that the child is protected and safe.
  - 6.10.2 Attempts will be made to help the bully (bullies) change their behaviour.
- 6.11 Actions (as appropriate):
- 6.11.1 The bully (bullies) will be asked to apologise.
  - 6.11.2 In serious cases exclusion will be considered
  - 6.11.3 Attempts will be made to reconcile the individuals (if appropriate).
  - 6.11.4 After the incident has been investigated and dealt with each case will be monitored to ensure there is no repetition.
- 6.12 Guidelines for homestays and staff to help them to support a student who has been bullied or subjected to on-line abuse.
- 6.12.1 Reinforce that no one deserves to be treated in this way and that they have done nothing wrong
  - 6.12.2 Ensure that they know that there is help available to them
  - 6.12.3 Encourage them to talk to someone that they trust such as a teacher or a member of the homestay family so they feel they have somewhere safe to go to
  - 6.12.4 Encourage them to talk to their parents/carers and if this isn't possible to write a letter or speak to another family member
  - 6.12.5 Take screen shots of the cyber bullying so that they have proof this is happening
  - 6.12.6 Report all abuse to the relevant social media networks by clicking on the "report abuse" button
  - 6.12.7 Keep a diary so they have somewhere safe and private to write down their innermost thoughts and feelings, which will help to avoid feelings bottling up



- 6.12.8 Give praise for being so brave and talking things through which will hopefully empower them to take responsibility and get help
  - 6.12.9 Sending abuse by email or posting it into a web board can be harassment and if this has happened make a complaint to the police who can trace IP addresses etc
  - 6.12.10 Ask the school if they have a School Liaison Police Officer that can help in this situation and talk to the school about the dangers and effects
- 6.13 What support and help is available?
- 6.13.1 We know that cyber bullying can have devastating impacts on some children and young adults, especially when they feel there is no let up from the abuse. So what help is available if you feel the child might be in danger of self harming or having suicidal thoughts?
  - 6.13.2 Keep the school involved and put things in writing so you have a formal record of what has been going on. Ask the school if there is any pastoral support your child can access.
  - 6.13.3 If your child has started to self-harm talk to your GP and a professional organisation who will be able to give you some much needed support such as Harmless or The National Self Harm Network Forum.
  - 6.13.4 Remember that you are important too so it's crucial that you are taking good care of yourself. The more relaxed you are feeling the better able you will be to support your child.
  - 6.13.5 If you are worried that your child is having suicidal thoughts seek some medical advice from your GP. Young Minds is a national charity committed to improving the emotional and mental wellbeing of all children and young adults under the age of 25. They have a parents' helpline where you can talk your situation through with a trained adviser.
  - 6.13.6 But it's not just children, Family Lives understands that cyber bullying affects adults too. We know that cyber bullying can also have a devastating impact on adults and can make you feel extremely isolated. It is very easy to post malicious and hurtful posts on social media sites as there is very little moderation and posts can go "live" before they can be reported. This can leave people feeling very vulnerable and at a loss as to what they can do.
  - 6.13.7 Please refer to the Equality act 2010, Government document 8 which sets out the legal parameters for discrimination. Please note that bullying can be a child protection issue and should be dealt with as such if the child is likely to face significant harm.
  - 6.13.8 Advice and guidance on [Preventing and Tackling Bullying, Mental Health and Behaviour in Schools](#)

## 7 Online Safety

7.5 The purpose of this policy is to:



- 7.5.1 To educate homestays, parents / agents and students about e- safety issues and appropriate behaviours so that they remain safe and legal online.
- 7.5.2 To help homestays, parents / agents and students to develop critical thinking skills to reflect and enable them to keep themselves safe.
- 7.5.3 To keep any personal data and information secure.
- 7.5.4 To minimise the risks of handling sensitive information.
- 7.5.5 Definition: Information Technology (IT) and the Internet are defined in this policy as all forms of computing, the Internet, telecommunications, digital media and mobile phones. Electronic communication includes using mobile phones, computers and other devices for email, text, instant messaging and social networking.
- 7.5.6 We welcome the development of new technologies for communicating and will use them wherever they are appropriate to enhance our work with young people.
- 7.5.7 We recognise our responsibility to take all reasonable measures to ensure that the risks of harm to young people's welfare are minimised; and, where there are concerns about young people's welfare, to take appropriate actions to address those concerns.
- 7.5.8 We recognise the need to protect staff and volunteers from inappropriate conduct from young people in their personal lives and from situations that may make them vulnerable to allegations of wrongful conduct.
- 7.5.9 We acknowledge that working for BOSSS UK requires appropriate conduct in public spaces outside our work and in our personal lives and that this includes electronic communication.
- 7.5.10 The use of the Internet, web based or mobile communications and social media by staff members must be appropriate to the staff member's role, lawful, proportionate and ethical. The use of illegal software or access inappropriate websites is not permitted and face dismissal.
- 7.5.11 Staff members must only access BOSSSUK's internal information for a legitimate and authorised purpose only, must not disclose internal information to unauthorised recipients and must maintain confidentiality of internal information.
- 7.5.12 Students are not allowed to use the Internet for any illegal activity; this includes accessing sites meant for adults or 18 years or older such as pornographic or gambling sites. Students must not search for, or browse through, any sites that contain offensive, obscene, violent, dangerous, inflammatory, racist or extremist material. Downloading any unlicensed material such as music, video, TV programmes, games and PDF files is illegal and therefore not permitted.
- 7.5.13 Staff members including the homestay and students, must be aware of the principles of the Computer Misuse, Copyright and Data Protection Act 1998.
- 7.5.14 It is important for students to understand the risks of social networking and to know how to remain safe and avoid making themselves vulnerable to identity theft, bullying, harassment, grooming and abuse for example. The Child Exploitation and Online Protection





body (CEOP) provides some useful guidelines and advice for parents, guardians, host families and students ([thinkyouknow.co.uk](http://thinkyouknow.co.uk) is the CEOP's online safety centre).

## 7.6 Online Safety

- 7.6.1 We recognise that the use of the Internet by students is difficult for homestays to monitor. We will explain our policies and practice to homestays and seek to ensure they are aware of our policy and guidance.
- 7.6.2 With the ever-growing use of the Internet, mobile telephones and social media, children can be bullied, harassed or even groomed and subsequently abused. BOSSS UK will work with its partner schools and homestays to ensure that children are advised on safe use of the Internet. It will provide guidance for homestays also and explain signs to look for in a child who is worried, such as a major change in demeanour, displays of anxiety or sleeplessness.
- 7.6.3 Homestays are required to provide basic Internet access for communicating with family members by email and completing homework and study tasks. Any social or recreational use is to be agreed between the Homestay and the GO.
- 7.6.4 It is appropriate for student to contribute a reasonable amount towards the Homestay families Internet cost if the student is accessing the Internet for social and recreational purposes. For example, face book, Skype, online gaming, downloading movies or music, watching movies or sending and receiving images.
- 7.6.5 Students must not use their Homestay families' Internet to access inappropriate or offensive websites.
- 7.6.6 Homestays who become aware of inappropriate or excessive Internet use should discuss this with their student(s) in the first instance. If such issues cannot be managed by the homestay and are of cause for concern then they should be reported to the DSL or their deputy.

## 7.7 Safe Use of the Internet Guidance for Homestays and Students

- 7.7.1 How to stay safe online. The Internet is great fun but it does have dangers and we want you to be safe online. When you join a chatroom you'll find people are very friendly but the person you are talking to might not always be who they say they are.
- 7.7.2 People can pretend to be your age and unfortunately there have been cases where adults have pretended to be teenagers and lured young people into meeting them in dangerous situations. Some of these cases have ended up in court in the UK.
- 7.7.3 Bullying UK has had experience of young people using the internet who have been persuaded into dangerous situations by adults. This is an offence called 'grooming'.
- 7.7.4 Internet Safety Tips
  - 7.7.4.1 Never give out your real name
  - 7.7.4.2 Never tell anyone where you go to school



7.7.4.3 Only meet someone from a chatroom in a public place with one of your parents or another adult. If they are genuinely who they say they are they will be happy to do this

7.7.4.4 Never give out your address or telephone number

7.7.4.5 Never agree to meet anyone from a chatroom on your own

7.7.4.6 Tell an adult if someone makes inappropriate suggestions to you or makes you feel uncomfortable online

#### 7.7.5 Danger Signs

7.7.5.1 If the person tries to insist on having your address or phone number

7.7.5.2 If the person emails you pictures which make you feel uncomfortable and which you would not want to show to anyone else

7.7.5.3 If the person wants to keep their chats with you secret

7.7.5.4 If the person tells you that you will get into trouble if you tell an adult what has been going on

7.7.5.5 If the person emails you pictures which make you feel uncomfortable and which you would not want to show to anyone else

7.7.5.6 If the person wants you to email them pictures of yourself or use a webcam in a way which makes you feel uncomfortable

7.7.5.7 If the person shares information with you and tells you not to tell anyone else about it

7.7.5.8 If the person wants to meet you and tells you not to let anyone know

7.7.5.9 If you find any of these danger signs it's important that you tell your parents or another adult.

#### 7.8 Suggestion and strategies that families use to manage and monitor Internet use

7.8.1 Implement time restrictions, for example Internet may be made available only 7– 10 pm on school nights; with additional access granted at the weekend.

7.8.2 Internet is made available only in a communal area such as an open living space to help homestays monitor the sites accessed and Internet use.

7.8.3 These guidelines also apply to other use of electronic media provided in the Homestay for example TV media packages, smart TVs, digital/video cameras, smart phones, tablets and landlines. This list is not exhaustive due to the constantly changing nature of modern technology.

7.8.4 Students are responsible and will be made accountable for any out of pocket expenses incurred by the Homestay caregivers through their use of home electronic equipment or



services for example, making toll calls, viewing payable services on a TV media package.

- 7.8.5 If Homestay caregivers are concerned in anyway due to students inappropriate or excessive Internet use or misuse of electronic media this be should be reported to the DSL or their deputy.

#### 7.9 Cyber-Bullying, grooming and on-line exploitation guidance for homestays and students

- 7.9.1 What is cyber bullying? 'Cyber bullying' means bullying behaviour that takes place via mobile phone or over the internet through emails, instant messaging and social networking websites.
- 7.9.2 Texts, messages or images are sent or posted online, which hurt, intimidate or embarrass another person.
- 7.9.3 Cyber bullying is not carried out face to face and people often don't know the identity of the person targeting them, but cyber bullying is no different from any other forms of bullying; the behaviour is the same and the impact is no less devastating.
- 7.9.4 Advances in technology are simply providing an alternative means of reaching people – malicious messages were once written on schoolbooks or toilet walls, they can now be sent via mobile phone or the Internet.
- 7.9.5 For children and young people, the Internet is a place not a 'thing'. It's something that allows them to connect with friends and other children and young people at any time of the day or night. This means that cyber bullying can happen virtually anywhere, and is no longer confined to the classroom or playground.
- 7.9.6 The use of the Internet as a tool to bully others allows information to be sent to a large audience instantly. It also provides a sense of anonymity and an ability to send material to others under a false name. Therefore, children and young people can be targeted in their own homes; in their bedrooms and personal spaces where they should normally feel safe and protected.
- 7.9.7 Where can cyber bullying happen? Cyber bullying can take place anywhere that children and young people have the use of technology. Some common places include: Facebook, YouTube, Instant message applications such as Skype or Facebook chat, Mobile phones, online gaming
- 7.9.8 What can we do about cyber bullying? Adults can help stop cyber bullying. Start by talking to children and young people about the issue and teaching them the rules that will help prevent cyber bullying from happening to them or someone they know. One of the best sources of advice for parents and for children and young people is CEOP (Child Exploitation and Online Protection Centre).
- 7.9.9 If the homestay suspects that the child is being cyber-bullied please contact the DSL or their deputy immediately.
- 7.9.10 What is online grooming? You've probably heard of the term 'grooming' before. In essence, this is a process used by people with a sexual interest in children to attempt to engage



them in sexual acts either over the Internet or in person.

- 7.9.11 The similarities between the online grooming process and the initial process of building online relationships can mean that some victimisation is going unnoticed as many victims don't realise they're being 'groomed'
- 7.9.12 Sadly, these people do attempt to make contact with children over the Internet; this may be in social networking sites, chat rooms or online games. They could do this by pretending to be someone else, or showing an interest in them.
- 7.9.13 It is important that children understand that people like this exist and that they should never do anything online or offline that they are uncomfortable with. Talk to your child about online grooming. Explain how easy it can be to lie online and the reasons why an adult may wish to contact them.
- 7.9.14 Tell them to speak to you if anything like this happens to them. Tips on how to approach this subject can be found on the CEOP website as well as how to report any inappropriate contact made to your child online. This can be done via [www.ceop.police.uk](http://www.ceop.police.uk) or contact your local Police station by calling 101 (or dialling 999 in an emergency).
- 7.9.15 If the homestay suspects that the child is being subjected to online grooming please contact the DSL or their deputy immediately.
- 7.9.16 What is online exploitation? Sexual online exploitation is the sexual abuse of children and youth using technology and online tools. This could be through the exchange of sex or sexual acts for drugs, food, shelter, protection, other basics of life, and/or money. Sexual exploitation includes involving children and youth in creating pornography and sexually explicit websites.
- 7.9.17 Child sexual exploitation is a complex form of abuse and it can be difficult for those working with children to identify and assess. The indicators for child sexual exploitation can sometimes be mistaken for 'normal adolescent behaviours'. It requires knowledge, skills, professional curiosity and an assessment which analyses the risk factors and personal circumstances of individual children to ensure that the signs and symptoms are interpreted correctly and appropriate support is given. Even where a young person is old enough to legally consent to sexual activity, the law states that consent is only valid where they make a choice and have the freedom and capacity to make that choice. If a child feels they have no other meaningful choice, are under the influence of harmful substances or fearful of what might happen if they don't comply (all of which are common features in cases of child sexual exploitation) consent cannot legally be given whatever the age of the child.
- 7.9.18 Potential indicators of child sexual exploitation. Children rarely self-report child sexual exploitation so it is important that practitioners are aware of potential indicators of risk, including:
  - 7.9.18.1 Acquisition of money, clothes, mobile phones etc without plausible explanation;
  - 7.9.18.2 Gang-association and/or isolation from peers/social networks;
  - 7.9.18.3 Exclusion or unexplained absences from school, college or work;



- 7.9.18.4 Leaving home/care without explanation and persistently going missing or returning late;
- 7.9.18.5 Excessive receipt of texts/phone calls;
- 7.9.18.6 Returning home under the influence of drugs/alcohol;
- 7.9.18.7 Inappropriate sexualised behaviour for age/sexually transmitted infections;
- 7.9.18.8 Evidence of/suspicious of physical or sexual assault;
- 7.9.18.9 Relationships with controlling or significantly older individuals or groups;
- 7.9.18.10 Multiple callers (unknown adults or peers);
- 7.9.18.11 Frequenting areas known for sex work;
- 7.9.18.12 Concerning use of internet or other social media;
- 7.9.18.13 Increasing secretiveness around behaviours; and
- 7.9.18.14 Self-harm or significant changes in emotional well-being.
- 7.9.19 If the homestay suspects that the child is being exploited online please contact the DSL or their deputy immediately.
- 7.9.20 Links to support online safety can be found in the KCSIE guide Annex D.

## Appendix A: Policy Consultation & Review

This policy is referenced on our website, available online and on request from BOSSS UK Ltd for parents, students, schools and homestays.

The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Professional Code of Conduct. This and all BOSSS policy will be reviewed in full by BOSSS UK on an annual basis and revisions circulated to key Individuals.

Signature **BOSSS UK**

Date 04/06/2022

Date	Status	Name	Change control comments
15/10/2016	Initial draft	Victoria Barfoot-Saunt	Initial draft complete and ready for review
02/09/2017	Annual Review	Victoria Barfoot-Saunt	Minor amendments



11/04/2018	Annual Review	Victoria Barfoot-Saunt	Update further to receipt of new AEGIS minimum standards
12/06/2018	Annual Review	Victoria Barfoot-Saunt	Update further to AEGIS feedback
26/05/2019	Annual Review	Victoria Barfoot-Saunt	Update further to AEGIS inspection 2 and changes in KCSE 18
12/06/2021	Annual Review	Victoria Barfoot-Saunt	Update further to Keeping children safe in education (2020) and January 2021 changes
04/06/2022	Annual Review	Victoria Barfoot-Saunt	Update further to Keeping children safe in education 2021 and 2022

Table of substantive changes following June 2022 review

Where	What
Google Drive	See Policy Review June-22 Review workbook



## Appendix B: AEGIS Check List 1 (CL1) Duties and Responsibilities of Guardianship Organisations and Host or Homestay Families

	Guardianship Organisation/ Educational Guardian	Host or Homestay Family as Educational Guardian	Host or Homestay Family only
1. Ensuring that an adequate child protection policy is in operation and comprehensive contracts between the guardianship organisation and parents and guardianship organisation and host families are in place.	Yes	N/A	N/A
2. Ensuring adequate safeguarding checks and inspections are carried out on guardianship organisation members of staff and all members of the host family over 16.	Yes	N/A	N/A
3. Providing host families and students with adequate guidelines and/or a manual.	Yes	N/A	N/A
4. Providing support and guidance on welfare and educational matters as appropriate to the age of the international student and service chosen.	Yes	Yes	N/A
5. Being contactable at all times and ready to deal with immediate problems or emergencies, including, for example, the removal of a student from school for illness and hospital admissions, whenever appropriate, possible and reasonable.	Yes	Yes	N/A
6. Notifying the student's school of any change of address and immediate contact information if out of contact for even a short period of time. [Ideally, a second contact, known to both, should then be appointed by the guardian or parents]	Yes	Yes	N/A
7. Completing the educational guardian form supplied by the school when required.	Yes	Yes	N/A
8. Always respecting the rights, religion and culture of the student.	Yes	Yes	Yes
9. Ensuring the collecting and returning of the student from/to school in accordance with the school timetable at half terms and exeat weekends, as agreed.	Yes	Yes	Yes
10. Not releasing care of the student without the relevant prior agreement.	Yes	Yes	Yes
11. Exercising the same caution as a responsible parent in allowing a student to stay somewhere other than in the host family home.	Yes	Yes	Yes
12. Keeping in adequate contact with parents, the student, the host family and the school as appropriate and as agreed. Emergency contact details must be provided to all.	Yes	Yes	Yes
13. Being aware of the Private Fostering legislation and reporting to the Local Authority as appropriate.	Yes	Yes	Yes
14. Caring for the student in the home as would a responsible and caring parent.	N/A	Yes	Yes
15. When providing accommodation in the home, taking day-to-day responsibility for the student while he/she is residing there, assimilating the student into the family as far as possible and being available and willing to receive a student into the home when necessary and as agreed.	N/A	Yes	Yes
16. Using only reasonable, appropriate and lawful means of control and contact with the student so as to provide comfort to the student if in distress and to maintain safety and good order in the home. Corporal punishment must not be used.	N/A	Yes	Yes
17. Being at home when the international student is there and providing suitable living and studying accommodation.	N/A	Yes	Yes
18. Not accepting paying guests into the household, or be running a bed and breakfast, whilst providing guardianship services in the home for an international student.	N/A	Yes	Yes
19. Providing a consistently good standard of accommodation and meals, where this is part of the arrangements made.	N/A	Yes	Yes
20. Allowing a representative of the school (or guardianship organisation where applicable) to inspect the suitability of the accommodation at least once a year.	N/A	Yes	Yes
21. Attending any relevant induction or other training offered by the school or guardianship organisation.	N/A	Yes	Yes
22. Ensuring that adequate insurance arrangements are in place for home and car and adequate attention to health and safety in the home	N/A	Yes	Yes

## Appendix C: Safeguarding and Child Protection Training





The Designated Safeguarding Lead (DSL) must attend suitable training as provided by either the Local Safeguarding Children Board (LSP), AEGIS or the NSPCC. On-line courses for designated safeguarding lead are not acceptable. This training must be renewed every two years.

Our staff training is recorded in our Staff Log, certificates retained for record and renewals monitored to ensure that the mandatory training is completed (Level 3 Safeguarding Children Course). We also encourage all staff and homestays attend a Safeguarding course of which details can be found below.

Dorsetforyou – Dorset council’s online portal - LSP - Safeguarding Training (Multi-Agency) training courses: <https://www.dorsetforyou.gov.uk/jobs-and-careers/training/social-care/safeguarding>


Training for those new to safeguarding or require more complex training and who work with children and families.


#### Courses

LSP Safeguarding Training is run pan-Dorset (to include Bournemouth and Poole). The LSP deliver over 15 courses, including:

- Level 3 Safeguarding Children Course & Update
- Emotional Abuse and Neglect
- Protecting Disabled Children
- Level 4 Child Sexual Exploitation
- Managing Allegations
- Safer Recruitment

#### To book

DCC staff should search using keyword 'LSP' in the Children and Young People courses section of the Learning and Development Community Site for the full list of courses and book via CPD online (opens in a new window) . Users need to register to access training.

Early Years settings and Schools continue to book this training via Dorset Nexus (opens in a new window) .

#### Costs

DCC Children's Services costs for attendance on LSP's training events are met from the Children's Services Learning and Organisational Development budget. Please read the LSP's cancellation policy carefully before booking a course to help us reduce unnecessary and costly recharges for non attendance'

#### Cancellations

Please read the LSP's Charging and Cancellation Policy (pdf, 71kb) (opens in a new window)  .

## Appendix D: Types and Signs of Abuse & Guidance for Raising Concerns



Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. Keeping children safe in education defines the following types of abuse.

**Physical abuse:** a form of abuse which 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:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature 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. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**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. They may also include 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.

**Peer on peer abuse:** Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

See BOSSS procedure for managing peer on peer abuse

**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.



Neglect: 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following specific safeguarding issues are also acknowledged:

Child sexual exploitation: involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Female genital mutilation: professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 11-12 of the Multi-Agency Practice Guidelines referred to previously. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Signs of abuse

Signs of abuse can be, but are not limited to, the following:

- The student says that he or she is physically abused;
- The student has been verbally abused, shouted or bullied;
- The student says that he or she has been touched by someone inappropriately and/or sexually;
  
- The student says that he or she has not been properly fed at school or in host family;
- The student appears dirty, hungry, inadequately clothed etc.;
- The student gained or lost a lot of weight;
- The student has unusual and unexplainable injuries.

What to do if you have concerns about a child or young person



If you are approached by a child, young person with a disclosure that they are being, or has been harmed or abused, or you are informed of such a disclosure by a staff member, homestay, partner school, student or member of the public.

Do:

- Stay calm
- Provide a listening ear and an open mind
- Be reassuring, particularly that the individual is doing the right thing by telling you
- Record the information you are provided with and report as quickly as possible to the DSL or their deputy (see section 2.7.1-2) who will decide what further action will need to be taken
- You should include a record of the time, date and persons present

Don't:

- Promise to keep the information secret. Make it clear that you have a duty to refer the matter on
- Stop the individual who is freely recalling significant events
- Make the individual tell anyone else. They may have to be formally interviewed later and it is important to minimise the number of times information is repeated
- Make any suggestions to the individual about how the incident may have happened
- Question the individual, except to clarify what they are saying
- Discuss the information with anyone other than the DLS or an appropriate external agency.

If you are concerned that a child, young person is, or may be subject to, abuse or harm:

- Make a written, dated note of observations
- Inform the DSL or their deputy as soon as possible, who will, within the appropriate timeframe, either make enquiries without raising the question of abuse and evaluate the matter and proceed with the necessary next steps
- If you have immediate concerns that a child or young person is at risk of significant harm contact Children's Services. If you think a criminal offence has been committed contact the police.

Children's Services:

0845 603 5620

Monday - Thursday 8.30am to 5pm

Fridays 8.30am to 4.30pm

All other times and for Weekends and Bank Holidays please use the Out of Hours number

Out of hours:

0845 600 45 55

Monday - Thursday 5pm to 8.30 am.

Friday 4.30 pm to Monday 08.30 am.

All day on Bank Holidays and Christmas Day.

The helpline is staffed by social workers and other specialists who can deal with anything.

Where there are concerns or specific allegations about the conduct of a member of staff/volunteer, homestay or teacher/partner school you should contact the DSL or their deputy. It is the responsibility of the LADO to liaise with other agencies or the police in appropriate cases.



#### 2.7.1 Designated Safeguarding Lead (DSL) contact details:

Name: Tina Wong

Email: [info@bosssguardians.com](mailto:info@bosssguardians.com)

Contact number (24 hour emergency): +44 (0)777 6206352

#### 2.7.2 Deputy Designated Safeguarding Lead (DSL) contact details:

Name: Candy Lam

Email: [info@bosssguardians.com](mailto:info@bosssguardians.com)

Contact number (24 hour emergency): +44 (0)7922 152628

The DSL should be advised of all cases where it is alleged that a person who works with children has:

- Behaved in a way that has harmed, or may have harmed, a child
- Possibly committed a criminal offence against, or related to, a child; or
- Behaved towards a child or children in a way that indicated they are unsuitable to work with children

## Appendix E: Additional forms of abuse and safeguarding issues

This section contains important additional information about specific forms of abuse and safeguarding issues. Staff who work directly with children should read this annex. KCSIE now applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021

if staff have any concerns about a child's welfare, they should act on them immediately. They should follow BOSSS UK's safeguarding and child and speak to the designated safeguarding lead (or deputy).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

### 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 which can be found on the GOV.UK website.

The guides 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 school's (or homestay'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.

#### Mental Health Concerns

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

The department has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See Rise Above for links to all materials and lesson plans.

A range of advice is available to help identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [Mental health and behaviour in schools](#) guidance. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See [Mental Wellbeing](#) for links to all materials and lesson plans.

#### Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

#### Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.



Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The 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. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non- contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors



including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

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 Mechanism 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.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- National crime agency human-trafficking
- NSPCC- UK domestic-abuse Signs Symptoms Effects  
Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse

### 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, and in accordance with local procedures, 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 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: [here](#).

### 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 multi-agency liaison with police and children's social care. Where FGM has taken place there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

## FGM

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

### FGM mandatory reporting duty for teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.<sup>100</sup> Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

## Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.



The Forced Marriage Unit has published statutory guidance and Multi-agency guidelines, with pages 35-36 of which focus on the role of schools and colleges. Staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufco@fco.gov.uk](mailto:fmufco@fco.gov.uk).

## Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach. See BOSSS UKJ's Anti-Radicalisation - Prevention Duty Policy<sub>8.5</sub> for additional detail and our Prevent lead contacts.

Extremism<sup>101</sup> is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. Radicalisation<sup>102</sup> refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a referral to the Channel programme.

## The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard<sup>103</sup> to the need to prevent people from being drawn into terrorism".<sup>104</sup> This duty is known as the Prevent duty.

The Prevent duty is part of our wider safeguarding obligations. See BOSSS UKJ's Anti-Radicalisation - Prevention Duty Policy<sub>8.5</sub> for additional detail and our Prevent lead contacts.

## Additional support

Educate Against Hate, a website launched by the Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British values) to help recognise and address extremism and radicalisation in young people. The platform provides information on and access to training resources for teachers, staff and school and college leaders, some of which are free such as Prevent e-learning, via the Prevent Training catalogue.

## Channel



Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: Channel guidance, and a Channel awareness e-learning programme is available for staff at: Channel General Awareness.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Channel referral. As a Channel partner, the school or college may be asked to attend a Channel panel to discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

#### Peer on peer abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

#### Serious violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and [its Criminal exploitation of children and vulnerable adults: county lines](#) guidance.

#### Sexual violence and sexual harassment between children in schools and colleges

##### Context

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 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.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT 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 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 (schools 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. 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.

If staff have a concern about a child or a child makes a report to them they should speak to the designated safeguarding lead (or a deputy). We have a zero tolerance approach to sexual violence and sexual harassment.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration;
- Being more prone to peer group isolation than other children;
- The potential for children with SEN and disabilities being disproportionately impacted
- By behaviours such as bullying, without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, we would engage the school to consider extra pastoral support for children with SEN and disabilities and consideration of the most appropriate homestay to support them.

Additional advice and support

Abuse or Safeguarding issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused	DfE advice
	Domestic abuse: Various Information/Guidance	Home Office
	Faith based abuse: National Action Plan	DfE advice
	Relationship abuse: disrespect nobody	Home Office website
Bullying	Preventing bullying including cyberbullying	DfE advice
Children and the courts	Advice for 5-11-year olds witnesses in criminal courts	Moj advice
	Advice for 12-17 year old witnesses in criminal courts	Moj advice
Children missing from education, home or care	Children missing education	DfE statutory guidance
	Child missing from home or care	DfE statutory guidance
	Children and adults missing strategy	Home Office strategy
Children with family members in prison	National Information Centre on Children of Offenders	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS) advice
Child Exploitation	County Lines: criminal exploitation of children and vulnerable adults	Home Office guidance
	Child sexual exploitation: guide for practitioners	DfE
	Trafficking: safeguarding children	DfE and HO guidance
Drugs	Drugs: advice for schools	DfE and ACPO advice
	Drug strategy 2017	Home Office strategy
	Information and advice on drugs	Talk to Frank website
Abuse or Safeguarding issue	Link to Guidance/Advice	Source
	ADEPIS platform sharing information and resources for schools: covering drug (& alcohol) prevention	Website developed by Mentor UK
"Honour Based Violence" (so called)	Female genital mutilation: information and resources	Home Office
	Female genital mutilation: multi agency statutory guidance	DfE, DH, and HO statutory guidance
	Forced marriage: information and practice guidelines	Foreign Commonwealth Office and Home Office
Health and Well- being	Fabricated or induced illness: safeguarding children	DfE, Department for Health and Home Office
	Rise Above: Free PSHE resources on health, wellbeing and resilience	Public Health England resources
	Medical-conditions: supporting pupils at school	DfE statutory guidance
	Mental health and behaviour	DfE advice
Homelessness	Homelessness: How local authorities should exercise their functions	HCLG
Online	Sexting: responding to incidents and safeguarding children	UK Council for Child Internet Safety
Private fostering	Private fostering: local authorities	DfE - statutory guidance
Radicalisation	Prevent duty guidance	Home Office guidance
	Prevent duty advice for schools	DfE advice
	Educate Against Hate Website	DfE and Home Office
Violence	Gangs and youth violence: for schools and colleges	Home Office advice
	Ending violence against women and girls 2016-2020 strategy	Home Office strategy

	Violence against women and girls: national statement of expectations for victims	Home Office guidance
	Sexual violence and sexual harassment between children in schools and colleges	DfE advice
	Serious violence strategy	Home Office Strategy

## Appendix F: Definitions

The following terms are used throughout the policy and procedure documentation.

- Agent – An educational agent refers to an individual or organisation that offer advisory services to students and their parents, such as school placements, in exchange for a fee paid by the family and/or commission paid by the educational institute they represent.
- Child Protection - is the protection of children from violence, exploitation, abuse and neglect. Article 19 of the UN Convention on the Rights of the Child provides for the protection of children in and out of the home.
- Day Student - a pupil who is resident within a homestay for more than 28 consecutive days.
- Designated Safeguarding Lead (DSL) - The role of the Designated Safeguarding Person was specified in the Children Act 2004 and ensured the every organisation had a “named person” for safeguarding children and young people.
- Educational Guardian - Designated Safeguarding Lead acts in loco parentis and has overarching pastoral and academic responsibility for safeguarding, care and welfare of students whilst they attend school in the UK. Responsibilities include being authorised to make certain decisions regarding emergency medical, dental treatment and matters of a disciplinary nature. An educational guardian is not a legal guardian.
- Exeat - designated weekend leave or period of absence from a boarding school.
- Guardianship Organisation (GO) - an organisation which provides the service of educational guardian for international students. The organisation may also be responsible for arranging accommodation for its students at an approved homestay.
- Homestay - a household approved and appointed, following a rigorous safer recruitment process, undertaken by the guardianship organisation, to provide accommodation for, and care of a student at weekends, exeats, half-terms or at the beginning or end of term or in the case of day students during school term times.
- Legal Guardian - the technical meaning of legal guardian refers to a person who is appointed by a court to care for a child because, for example, the child's parent or guardian has died. Legal guardian can also signify a person acting as a testamentary guardian or a guardian of a child's estate.
- Parent - an overseas parent who appoints a guardianship organisation to act in loco parentis for his or her child/children while studying in either a day/boarding school or college in the UK.
- Primary Carer - person in homestay with overall responsibility for the international student while staying with the homestay.
- Safeguarding - Safeguarding is the action that is taken to promote the welfare of children and protect them from harm.
- Student - an overseas pupil who is either a day pupil or full or weekly boarder in a school or





college, either independent or maintained, in the UK.