



## Safeguarding Policy for under 18s

### Designated Safeguarding Leader: Duygu Cevik

#### A) Policy Statement

- a. **Policy Statement Context** This policy document is for all staff at Bournemouth School of Marketing International (4a Westover road, Bournemouth, BH1 2BY) relevant to students between the ages of 12 and 17 for our courses offered to “adults” (hereby over 18) at the school premises and in school provided accommodation (homestay).
- b. **Statement** The policy of safeguarding and child protection for students aged 12 to 17 at Bournemouth School of Marketing International can be summarised as: The obligation to look after and care for students between the ages of 12 and 17 in way that the staff would treat their own children of a similar age (safeguarding). This extends to protecting students between these ages from direct harmful behaviour which occurs on an incidental basis (child protection).
- c. **Under 18’s Entitlement** The policy provides an entitlement to be protected to all students between the ages of 12 and 17 of all races, genders, beliefs, religions and background.
- d. **Adult’s Responsibilities** All staff under contract with Bournemouth School of Marketing International have an obligation to protect students aged under 18. There must be at all times a strong commitment to safeguarding by being aware, vigilant and knowledgeable in who to report concerns or allegations both within the organisation and externally. It is the organisation’s obligation to provide regular, up-to-date training of best-practice in safeguarding and child protection.

B) **Code of Conduct** All staff and students at Bournemouth School of Marketing International will be made aware of the need for a Code of Conduct. Central to this is the idea of building trust between students and staff at the school, which is seen as a positive attribute in a multi-cultural language learning environment. It is intended that BSMI will provide a safe and enjoyable learning environment for all students, regardless of age. Bournemouth School of Marketing International recognises the need to provide an environment which meets the best-possible standards of conduct for all students, which will be driven by the needs of our youngest students

- a. **Position of Trust** All members of staff will recognise the position of trust, which is an implicit part of their role. This must be displayed through conduct, manner, behaviour and approach towards all students, particularly under 18s. The Sexual Offences Act 2003 states that it is a criminal offence for a person in a position of trust to engage in sexual activity with an individual aged 16-18 for whom there is a responsibility despite the legal age of consent being 16 years old. For this reason, no staff member of Bournemouth School of Marketing International may engage in sexual activity with any student at the institution, regardless of age.



- b. Adult – U18 Interaction Below is a list of specific instructions for interacting with under 18s:
- No physical contact between adults and under 18s unless it is direct action to remove the student from imminent physical danger (e.g. getting hit by a bus)
  - Avoiding being alone with 12-17 year olds in a room with the door closed
  - Establishing behavioural boundaries
  - Giving positive encouragement and praise whilst being measured and appropriate in disciplining bad behaviour
  - No socialising with under 18s outside school, including via social media
  - No swearing, cursing or blasphemy in front of under 18s
  - Appropriate classroom content – No mention of risqué topics which you would expect your children to be exposed to. This includes using activities which are age appropriate
  - Setting of clear meeting times and locations for off-site excursions. Checking instructions via instruction checking questions (ICQs)
- c. IT & Social Networks Bournemouth School of Marketing International takes the issue of internet safeguarding and child protection seriously. All internet searches will be protected with safe-mode filters to mitigate the risk of viewing graphic or inappropriate content online. In addition, regular monitoring of internet histories on school computers will mitigate the risk of accessing internet chat-rooms with inappropriate content.
- d. Whistleblowing In the event of a specific concern regarding a colleague’s behaviour towards a student, the person giving the disclosure will not be penalised, and the information will remain confidential. Bournemouth School of Marketing International will make efforts at all times to create an environment in which disclosures are encouraged and should be viewed as an opportunity to “do the right thing”.
- C) Child protection
- a. When Adults Need to Respond There are a number of scenarios, which warrant a response from an adult:
- If the adult notices a child protection issue themselves
  - If the adult is told about a child protection issue from another person (adult or under 18)
  - If the adult is told about a child protection issue directly by the under 18. In each event, there is a formalised procedure to follow which is made available to all members of staff (Staff Handbook).
- b. Recognising Symptoms of Abuse Bournemouth School of Marketing recognises 4 main areas of abuse, which are; physical; sexual; emotional and neglect. Specific guidance will feature in the training provided to all staff.
- Physical abuse: Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a person/student. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a person/student.



- Physical indicators; unexplained bruising, marks or injuries especially on areas of the body where accidental injuries are unlikely, bruises which reflect hand or fingertips marks, cigarette burns, scalds, broken bones.
- Behavioural indicators; fear of going home, fear of parents being contacted, flinching away when approached or touched, withdrawn behaviour, reluctance to get changed, running away.
- Emotional Abuse: Emotional abuse is the persistent emotional maltreatment of a person/student such as to cause severe and persistent adverse effects on the student's emotional development. It may involve conveying to a person/student that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person/student. It may feature age or developmentally inappropriate expectations being imposed on a person/student. These may include interactions that are beyond the student's capability, as well as overprotection and limitation of exploration and learning, or preventing the student participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing a person/student to frequently feel frightened or in danger, or the exploitation or corruption of students. Some level of emotional abuse is involved in all types of maltreatment of a student, though it may occur alone. Physical indicators; failure to grow or thrive, sudden onset of speech disorders, developmental delay. Behavioural indicators; fear of going home, fear of parents being contacted, excessive fear of making mistakes, unwillingness to play or take part, neurotic behaviour (e.g. hair twisting, rocking), self-harm.
- Sexual Abuse: Sexual abuse involves forcing or enticing a child, young person or vulnerable adults to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging students to behave in sexually inappropriate ways.
- Neglect: Neglect is the persistent failure to meet a person's/student'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 misuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child/student from physical or emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care-takers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's/student's basic emotional needs.
- Physical indicators; inappropriate clothing, weight loss/underweight, constant hunger, tiredness.



- Behavioural indicators; truancy, lateness, missing doctor or hospital appointments, stealing food, few friends, regularly left alone or unsupervised.
- c. A Child Telling an Adult (Disclosure) Detailed step-by-step guidance is a feature of training for all staff. Each member of staff must be aware that he or she may be the person to whom the under 18 discloses. Therefore, everyone in the organisation must be aware of the procedure and the right way to respond.
- d. If an Adult is Accused If an adult is accused of committing a child protection crime, the following procedure will be followed (whether it is physical, sexual, emotional or neglect):
  - Ensure the child is safe, supported and reassured.
  - Inform the DSL immediately.
  - When appropriate, return the child to their normal routine.
  - Ensure a clear written record has been made on the standard form. Signed and dated by the person making the allegation, or the person who heard the allegation from a child.
  - The DSL or alternative senior member of staff must contact the relevant local authorities.
- e. If the DSL is accused
  - Ensure the child is safe, supported and reassured.
  - Inform a senior member of staff immediately.
  - Ensure that another staff member is aware of the private meeting with the student.
  - Ensure a clear written record has been made on the standard form. Signed and dated by the person making the allegation, or the person who heard the allegation from a child.
  - The senior member of staff must contact the relevant local authorities.
- f. If a Child is accused If a child is accused of committing a child protection crime against another, Bournemouth School of Marketing recognises the issue as very serious but more complex than if an adult is accused. In the event of the disclosure being physical in nature, the following steps will be followed:
  - Protect both of the children (accused and accuser) making sure they are safe and reassured.
  - Gather as much evidence as possible from the accuser (child) about the alleged incident (in private with an accompanying member of staff. Ask open questions – avoid leading yes/no questions. If the child's level of English is low, use the services of a professional translator)
  - Gather as much evidence as possible from the accused (child / children) about the alleged incident (to be done separately / individually i.e. not at the same time as step
  - In the case of many children being accused, each child must be interviewed separately. In private with an accompanying member of staff. Ask open questions – avoid leading yes/no questions. If the child's level of English is low, use the services of a professional translator)
  - Once the incident is recorded and witnesses are questioned, DSL should contact LSCB for further guidance
  - Managing Director / Principal to contact the children's (accuser and accused) parents informing them of the incident
  - Depending on the outcome of stages 3 and 4, the either child / group of children may need to be sent home.



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- Depending on the advice of the LSCB, the accused may need to be suspended from school with immediate effect.
- In the event of two students aged under 16 engaging in sexual activity, the LSCB will be informed and further guidance will be requested. In the event of an over 16 engaging in sexual activity with an under 16, the LSCB will be informed and further guidance will be requested. Due to the nature of two 16-18 year old engaging in sexual activity, there is no context for abuse of a position of trust. In addition, because of the age of consent being 16 years, it adds a further element of complexity to the situation. Furthermore, it is also important to distinguish between “romance” and sexual abuse in this context. In the event of a claim of sexual abuse, the same procedure as above (1-7) will be followed. In order to mitigate the risk of abuse occurring by an under 18 on an under 18, all staff are asked to remain vigilant during lessons, activities and excursion. Make a note of any behaviour which you think is necessary and report it to management immediately, where it will be logged in the appropriate records.

Due to be reviewed June 2017