Dulwich College Shanghai Puxi

Safeguarding Policy

This policy was written by the DCI Chief Education Officer, the DCI Safeguarding Consultant and the DCI Designated Safeguarding Leads and is subject to annual review and final approval by the DCI Group Executive Board.

Individual Colleges or Schools amend the policy as required by local regulations or context.

The DCI Chief Education Officer will ensure compliance with this Policy across the DCI Group of Colleges and Schools.

Updated: November 2020

Table of Contents

If you are a member of staff the links in this document will take you to [My Safeguarding](#) on [Dulwich ConnectED](#) where further resources can be found.

1 AN INTRODUCTION

We define Safeguarding as *the way in which we provide a safe and effective environment so that all our students can fully develop and learn*.
Our Safeguarding approach applies to all adults visiting or working with students in DCI Colleges and Schools, including staff, volunteers, interns, gap students, contractors, consultants, board members, guests and visitors.

1.1 Our commitment

We take every step in all areas of our practice to ensure that students in our care are protected from all forms of abuse and neglect.

"At Dulwich College International we believe that Safeguarding is everyone's responsibility. Everyone in our Colleges and Schools who comes into contact with our Students and their families has an important role to play. To do this effectively, all our staff and volunteers must make sure that at all times they consider what is in the best interests of the child. Students come first."

[Fraser White](#), Chairman, Dulwich College International

1.2 Our guiding principles

The following principles underpin our commitment to Safeguarding:
- We listen to our students and put them first
- We ensure that Safeguarding is central to all that we do

- We ensure that Safeguarding is a standing item on all meeting agendas.

- We recruit safely
- We train every adult working or volunteering in our College
- We support the needs of individual students and recognise that some students are potentially more vulnerable than others.

1.3 Our core competencies

Through professional learning and dialogue, we ensure that every staff member and volunteer will meet the following competencies:
1. Place the student at the centre of all that you do
2. Understand possible signs and indicators of abuse and neglect
3. Know how to respond and communicate with students
4. Be persistent in your response to safeguarding needs
5. Understand what might make some students more vulnerable
6. Understand your College Safeguarding policy, related policies and Code of Conduct
7. Know how to share key information safely and who to share it with

1.4 Our context

We believe that every student has a right to feel safe and our child-centred approach is modelled on the [United Nations Convention on the Rights of the Child](#) and we draw upon best practice internationally.

"We have a shared approach and standards to the way we keep students safe across our Colleges and High Schools. However, we respect that each school must consider their cultural context and any local or national regulations."

Lesley Meyer, Chief Education Officer, Dulwich College International

We have Colleges and High Schools in China, Korea, Singapore and Myanmar.

We comply with local and national Safeguarding legal requirements and meet all standards required by the Council of International Schools (CIS).

We recognise that the Covid-19 pandemic has caused us to review our Safeguarding procedures and will adapt this policy when needed.

The College does not offer homestays for students.

2. WHAT IS CHILD ABUSE?

2.1 Indicators of abuse and neglect: Appendix A; Dulwich ConnectED

In our DCI Colleges and Schools, the indicators of abuse and neglect include:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

You can find definitions and more information on Dulwich ConnectED

3. HOW DO WE KEEP OUR COMMUNITY SAFE?

3.1 Key responsibilities

The key roles and responsibilities across the DCI Group and within the College can be found below. A photo of each key person is on Dulwich ConnectED and details are posted around your College. Important reporting phone numbers are on the back of each lanyard.

Within each College or School, the following have specific Safeguarding roles:

Role	Person
DCI Director of Safeguarding (Board of Management Representative)	Lesley Meyer lesley.meyer@indulwich.com 131 2083 0989
Head of College	David Ingram david.ingram@dulwich-shanghaiminhang.cn WeChat ID: harbledown Back-up: Lesley Meyer
Designated Safeguarding Lead	Gary Polglaze gary.polglaze@dulwich-shanghaiminhang.cn WeChat ID: GaryP_64 Back-up: David Ingram
Child Protection Officer - Primary	Christine Haslett christine.haslett@dulwich-shanghaiminhang.cn WeChat ID: christine_haslett Back-up: Kelly King
Child Protection Officer - Secondary	Kelly King kelly.king@dulwich-shanghaiminhang.cn WeChat ID: wxid_zerioop47ynx22

	Back-up: Christine Haslett
Local Staff Focal Point	Chris Zhang chris.zhang@dulwich-shanghaiminhang.cn
Safeguarding Lead Trainer	Natasha Dennis natasha.dennis@dulwich-shanghaiminhang.cn

Responsibilities of the DSL and CPO

Designated Safeguarding Lead (DSL)
- manages safeguarding concerns;
- conducts Two-year audit cycle
- collects the concern record and instruct any instance when a staff member has used
  reasonable force to deescalate a harmful situation;
- conducts Two-year audit cycle;

Child Protection Officer(s) (CPO)
- manages child protection concerns;
- manages disclosure, reporting and recording concerns about a student;

The Lead Trainer(s)
- leads internal training
- trains other staff to become trainers

Each College has a Safeguarding Working Party made up of representatives from each area of the College or School and will include:
- the Designated Safeguarding Lead(DSL)
- the Child Protection Officer(s) (CPOs)
- the Lead Trainer
- E Safety/IT Lead

The DSL will be the Chair of this working party and will report directly to the Head of College. The role of the College Safeguarding Working Party is to:
- Monitor Safeguarding practices within the College
- Develop an action plan encompassing operational practices and strategic development relating to the annual audit.
- Oversee professional learning with regards to Safeguarding

This group will meet at least once a year to review DCI policy and recommend updates.

3.2 Disclosure, reporting and recording
CPOMS (a digital platform) is used for recording and monitoring child protection concerns. In some circumstances staff may use Appendix C; ConnectED which will be uploaded on to CPOMS by the CPO

In our College, we take a systematic approach to managing concerns, considering:
- each student's developmental needs
- the duty of care of those looking after each student
- family and environmental factors

We define concerns as:

- **Child Protection concerns**, where the student is at significant or immediate risk of harm
- **Safeguarding concerns**, where the student is potentially vulnerable, but not at significant or immediate risk of harm

Upon receipt of a Child Protection concern, the Child Protection Officer informs the Head of College. The Designated Safeguarding Lead is informed or consulted as appropriate.

When a Safeguarding concern arises, the Child Protection Officer consults with the Designated Safeguarding Lead to ensure that the appropriate strategy is agreed and implemented. The Head of College will be informed.

In the absence of the Head of College, or where the issue is related to the Head of College, concerns will be taken directly to:
Lesley Meyer: the DCI Chief Education Officer

OR in the absence of DCI Chief Education Officer:
Kate Beith: the DCI Safeguarding Consultant

Disclosure, reporting and recording concerns about a student
All adults working in, volunteering or visiting DCI Schools must report concerns
immediately, they must maintain confidentiality and report immediately to their identified CPO or Deputy CPO. They will be asked to record their concerns in CPOMS or the Confidential Record of Concern form (available from the CPO): Appendix C; Dulwich ConnectED.

The CPO will also record and manage any such concerns about Safeguarding and peer on peer abuse: Appendix D; Dulwich ConnectED. Such concerns will always be taken seriously and acted upon.

It is the responsibility of the CPO to take the next steps in the process. All documentation will be stored in CPOMS. Staff must feel confident that they will be supported if they report any concerns about a student. Staff will be expected to ensure that any reports written about any Safeguarding situation are child-centred, in the student's best interests, rooted in child development and informed by evidence.

The Head of College may instruct the CPO to gather a response team to assess a reported child protection concern. The team participants will depend upon the nature of the situation. The team will take a holistic approach, addressing the student's needs within their family, the College, the wider community and the local or international context.

The College must consider local laws and regulations concerning the reporting of suspected instances of domestic abuse and any other circumstance under which the physical and mental health of a minor is seriously harmed or the minor is facing the risk of unlawful infringement (minor's personal rights, property rights or other rights being infringed). Should a circumstance arise that may lead to a reporting obligation, guidance should be immediately sought from the DCI Chief Education Officer who may consult with a member of the DCI legal department. Upon advice from the DCI Chief Education Officer, the College shall report to law enforcement agencies instances of child protection concerns and submit all relevant documentation, if so required by local laws and regulations. All adults working in, volunteering or visiting DCI Schools shall fully cooperate with law enforcement agencies in accordance with local laws and regulations.
Decisions made by the response team should be agreed with the student and family where possible. A clear process of evaluation and timeframe will be recorded along with the impact of any change on the welfare of the student

3.3 Confidentiality

The College and all members of its staff will ensure that all data relating to all students is confidentially managed in CPOMS accordance with the requirements of DCI and applicable national or local guidance, laws or regulations.

Those reporting any Safeguarding concerns will adhere to the lines of communication, ensuring confidentiality. The CPO will support the agreed process, and the College will give detailed information about lines of communication in the induction process and at the beginning of every academic year.

Any member of staff who has access to confidential information about a student and / or the student's family must take all reasonable steps to maintain confidentiality. The Head of College and CPO will agree the appropriate next steps regarding this information.

Regardless of the duty of confidentiality, any member of staff who has reason to believe that a student is at immediate or significant risk of harm, has a duty to forward this information without delay to the CPO. Unless otherwise expressly required by local laws or regulations, volunteers and visitors are not authorised to take any action; their roles are strictly limited to reporting if they are concerned or have witnessed any concerning behaviour while in the College.

3.4 Transferring child protection files

When a student with an active child protection file moves to another school, the College has a clear moral duty to inform, or attempt to inform, that school that there is an issue about which they should be aware. Colleges or Schools must check the legal requirements in the country where they are operating in but, where the legal position is unclear, the Head of College must make a phone call rather than transfer documentation if there are any child protection issue.
The Head of College must record the call in CPOMS, to include the date and time of the call, who the call was made to, their position in the School and the nature of the communication.
If there is a significant issue to report, there is a duty to call the Head of College/Director or the DSL; it is not appropriate to leave information with another member of staff.
The first duty of the College is to protect the student (*Students Come First*) and if in doubt it is better to make the call and raise a concern. Further guidance can always be sought from the DCI Chief Education Office or, in her absence, the DCI Safeguarding Consultant.

- Files must be kept permanently and securely.
- Student files must not be transferred to other schools.
- The Head of College may make (or offer to make) calls to Schools and update the new School on any Safeguarding issues.

3.5 Retention and review of files

All file documentation relating to concerns about a student or adult will be kept indefinitely and stored in CPOMS. The Head of College will regularly monitor all current child protection files, within CPOMS with the Child Protection Officers (CPOs).

3.6 Early help

The College will ensure that any internal, cross college, local, national or international sources of support are identified though the College mapping tool. Contacts may be used to support students and their families when early signs of any challenges to a student's safety or wellbeing are evident.

The College will ensure that all members of staff and employees are familiar with the procedures for keeping a confidential online or written record of any incidents. Appendix C; Dulwich ConnectED.

Members of staff and volunteers are **not** required and must not investigate; staff or volunteers who believe that a student may be at risk will immediately refer concerns to their CPO.

The College encourages a culture of safe reporting for all members of the College community, including concerns about peer on peer abuse, either online or in person.

3.7 Peer on peer abuse
All staff should be aware that students can abuse other students (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:
- Bullying (including cyberbullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence, such as rape, assault by penetration and sexual assault;
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Sexting (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals.

Keeping Children Safe in Education 2020

The College ensures that regular learning opportunities are created to minimise peer on peer abuse. They must also ensure that students know how to recognise unacceptable behaviour from adults or peers and feel confident to report any concerns they may have. Education on this will be delivered annually through the *Speak Out Stay Safe* learning framework.

3.8 Safer recruitment
To ensure that students are protected while at the College, we will carefully select, screen, train and supervise our staff.

Details of the safer recruitment policy followed can be found in the DCI Recruitment Policy on Dulwich ConnectED.

3.9 Professional safeguarding learning
The College has a Safeguarding Training Team consisting of:
- Two lead Safeguarding Trainers (one fluent in English, and one fluent in the local language) and an appropriate number of Safeguarding Trainers.
- The Professional Learning Directors at the College shall support the Safeguarding
- Training Programme.

All DCI Training supports staff in ensuring that they meet the required DCI Safeguarding Competencies. Training requirements for every College or School member can be found in the DCI Competency and Training Framework: Appendix E; ConnectED.

Find out more about the role of the Safeguarding trainer in
Appendix B; ConnectED. The role of the Safeguarding Trainer that will be added to each job description so that this role forms part of the professional review process.
All training materials for the use of Trainers will be kept in a designated central location on TEAMS. Other resources can be found on ConnectED.
Our College is committed to face to face training but in 2020/21 online initial training will be available to support the current Covid19 situation where staff may spend some of induction time in quarantine.

Limited supporting training materials are also available through www.educare.co.uk. Logins are available through the School HR Department.

Training schedules will be posted online at the College or via Dulwich ConnectED.

Training is evaluated at the end of each academic year to inform future development.
Further information, training resources for staff and volunteers can be found on Dulwich ConnectED.

3.10 Reflection, reviewing and evaluating for impact
Annual Safeguarding Reviews and Audits Compliance Review

In Term 1, the College will meet with the DCI Chief Education Officer and DCI Safeguarding Consultant, using the DCI Safeguarding Compliance Review protocol. Any action arising from this will be incorporated into the School's Safeguarding Action Plan.

Two-year audit cycle
The College will be alternately internally and externally audited on a two-year cycle.
The internal audit uses the DCI Internal Audit Protocol and is carried out by the Head of College and DSL. The findings of the audit will be discussed in an online meeting with the DCI Audit Consultant.
The external audit is conducted using an agreed protocol by an external consultant. The action plan resulting from the audit will be agreed and signed by the following:
- The DCI auditors
- The Head of College
- Designated Safeguarding Lead
- The DCI Chief Education Officer

The Head of College will ensure that the Safeguarding Working Party, chaired by the DSL, will review the action plan at three meetings per year.
The DSL will discuss the action plan with the Head of College at their termly Safeguarding meetings, and Head of College will report progress at each meeting of the Board of Management.

3.11 Student learning
Students in every year group will be given information and strategies to safeguard themselves in the first six weeks of each academic year. The College/School will use the Speak Out Stay Safe learning framework.

4. PROFESSIONAL AND PERSONAL CONDUCT OF STAFF, VOLUNTEERS AND VISITORS

4.1 Codes of conduct

The College has a duty to ensure that professional behaviour applies to relationships between staff and students, and that all members of staff are clear about what constitutes appropriate behaviour and professional boundaries.

Induction training will be based upon the Code of Conduct. Once completed, all staff will sign the **DCI Safeguarding Code of Conduct**: Appendix F: Dulwich ConnectED. This will be resigned annually.

4.2 Volunteers, visitors and contractors

We recognise that some people who may be unsuitable for working with children, may use volunteering as an opportunity to gain access to students. The Head of College of College will ensure that a risk assessment is undertaken on regular volunteers (including gap students and interns) and will determine whether or not to proceed with criminal record and identity checks. All regular volunteers will also receive the relevant level of Safeguarding training, sign the Safeguarding Code of Conduct: Appendix F; Dulwich ConnectED. This will be recorded on the single central record (SCR).

Parents or other volunteers who help on an occasional basis must work under the direct supervision of a member of staff, and may not have any unsupervised contact with students. They must also sign the Volunteer Safeguarding Statement: Appendix G; Dulwich ConnectED.

The College shall maintain a Safeguarding Guide for all visitors. All visitors who come on campus will be asked to read the Safeguarding statement before being issued a visitor's pass.

The College will ensure that all service providers and contractors they work with must sign the DCI standard Supplier Agreement: Appendix N, in order to put the onus on the service providers to warrant that their personnel have no criminal or violent record, no inappropriate behaviour, and the service providers have known them for a period of time to know their personnel adequately and that any personnel from these companies will sign the Safeguarding Code of Conduct, that they are supervised on site and given appropriate training.

4.3 Allegations against a member of staff, volunteer or board member

When an allegation is made against a staff member or other adult, whether by a student or another adult, the DCI procedure for managing allegations will be followed as outlined in the *Management of Safeguarding Concerns and Allegations about the Conduct of Staff Policy*

4.4 Safeguarding whistleblowing guidance

A staff member may recognise that something is wrong but may not feel able to express concerns because of loyalty to colleagues or a fear of harassment or victimisation. We encourage all adults to ensure that students are their priority and should not be unnecessarily at risk. This is known as 'whistleblowing'.

Reasons for whistleblowing:

- Every individual has a responsibility to raise concerns about unacceptable practice or behaviour in relation to the safety and welfare of our students.
- To prevent a problem from becoming more serious.
- To protect or reduce risks to other students in the College.

How to raise a concern:
- Concerns should be expressed as soon as possible. The earlier a concern is expressed the sooner action can be taken.
- The concern should express exactly what practice is causing concern and why.
- The person raising a concern should approach the Head of College immediately and, in her/his absence, the DCI Chief Education Officer, Lesley Meyer or the DCI Chairman, Fraser White.
- If a concern is expressed about the Head of College, it should be referred to the DCI Chief Education Officer, Lesley Meyer or the DCI Chairman, Fraser White.

The next steps:

- The staff member specified in any whistle blowing procedure should be given information about the nature and progress of any enquiries.
- The College has a responsibility to protect the staff member from any harassment or victimisation including, where appropriate, keeping the whistle blowing staff member's identity confidential.
- No action will be taken against the whistle blower if the concern proves to be unfounded and was raised in good faith.

Further advice and support
It is recognised that whistle blowing can be difficult and stressful. Advice and support will be made available to the member of staff concerned.

4.5 Self-reporting
Occasionally a member of staff may have a personal difficulty that they know is impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so that professional and personal support can be offered. Whilst such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of students in the College.

4.6 Safe Touch
Due regard should be given to the 's Safe Touch policy.
There are occasions when physical contact with a student is necessary.
Examples of this could include, but are not exclusive to:
- holding the hand of a young student when going to assembly or when walking together around school and school trips (dependent on age/need)
- comforting a distressed student (hand lightly on shoulder)
- a student being congratulated or praised (shaking their hand)
- demonstrating how to use a musical instrument
- demonstrating exercises or techniques during PE lessons or CCA's
- giving first aid treatment

Wherever possible a student should be notified that touch is going to happen.

4.7 Deescalating harmful situations
It is essential to understand that the first step in managing a potentially harmful situation is to deescalate through talking, use of body language and a calm but firm response.

On a rare occasion, a staff member may have to make a physical intervention to a student that is not expected. Staff should use their professional judgment, considering their own safety before making the decision to physically intervene. They should have exhausted their skills to deescalate the situation through non-physical methods.

Staff should only do this:

- where action is necessary in self-defence or because there is an imminent risk of personal injury
- where there is a developing risk of injury or significant damage to property

Examples of such situations are:

- a student attacks a member of staff, or another student/students fighting
- a student is causing, or at risk of causing, injury or damage by accident, by rough play, or by misuse of dangerous materials, substances or objects
- a student is, or appears to be, under the influence of alcohol or illegal substances to prevent a student at risk of harming themselves during physical outbursts

Physical intervention can take a number of forms. It might involve staff; physically interposing between students, blocking a student's path, guiding a student away

A record of concern should be completed by the end of the school day and handed to the CPO to inform them of any instance when a staff member has used reasonable force to deescalate a harmful situation. Particular adults in the College will receive training bespoke to their role to use reasonable measures to prevent physical harm for any student who may require physical intervention as part of an individual care plan: Refer to the College's Safe Touch Policy.

5. DIGITAL SAFETY

E-safety is an integral part of the curriculum.

Online learning that takes place will do so on College approved platforms. During online learning students and teachers may engage in learning activities in more informal locations that are different to the usual professional classroom environment. We also recognise that online learning can break down barriers and mean that students may speak more freely. It is important that the College/School must give clear guidance must be given to staff, students and parents and draw attention to the Codes of Conduct.

The use of ICT equipment and systems are well monitored and appropriate actions are taken where issues are identified. We are committed to ensuring that our College is a safe digital learning community through the curriculum, professional development, auditing of systems, working with parents and developing detailed e-policies.

Staff, students, parents, visitors and volunteers are expected to engage in the safe and responsible use of social media. However, any member of staff who has or is alerted to any child protection concerns related to the use of the internet or social media should follow the lines of communication set out in this policy.

The College acknowledges that parents like to take photos and videos of their children in performances, sports events and other presentations. This is a normal part of family life, and we will not discourage parents from celebrating their children's successes.

If parents indicate to the College that they would not like their child's photograph or video to appear in the College's materials, brochures, websites, advertisements or press releases, we will ensure that the parents' wishes are fulfilled. The College cannot, however, be held accountable for any photos or videos taken by parents or members of the public at School functions and shared thereafter via social media or other means.

Staff are expected to take photos of students for educational purposes (such as Tapestry, Educa, Seesaw etc.) on College devices but in the unlikely event of taking photos on personal devices, these images must be deleted immediately. Any approved lesson recordings should also be deleted immediately.

The College has an E-Safety policy and due regard should be had to the practices contained within.

Safeguarding Policy links

The following essential and relevant policy documents can all be accessed on the School server.

- Management of Safeguarding Concerns and Allegations about the Conduct of Staff Policy.
- Safe Touch Policy
- Use of Reasonable Force Policy
- Recruitment Policy
- Anti–bullying Policy
- Health and Safety Policy
- Behaviour Management Policy
- Fire Safety Policy
- Lockdown Policy and other emergency procedures
- First Aid Policy (medical procedures)
- Educational Visits Policy (to include risk assessments)
- Supervision of Students Policy
- Procedures for maintaining admissions and attendance registers
- E-safety Policy
- CCTV Surveillance Policy

Appendices

A. Indicators of abuse and neglect
B. Key roles and responsibilities
C. Confidential Record of Concern (RoC)
D. Record of concern Tracking document
E. DCI Competency and Safeguarding Training Framework
F. Safeguarding Code of Conduct
G. Volunteer Safeguarding statement
H. Visitor Safeguarding statement
I. Flow chart *reporting a concern about a student*
J. Flow chart *managing allegations reporting about an adult*
K. Head of College checklist
L. DCI Safeguarding Compliance Review protocol
M. DCI Internal Audit protocol
N. DCI Supplier Agreement