



Dulwich College Suzhou

Safeguarding Policy

This policy was written by the Education in Motion (EiM) Chief Education Officer, the EiM Safeguarding Consultant and the Designated Safeguarding Leads and is subject to annual review and final approval by the EiM Group Executive Board. The EiM Chief Education Officer will ensure compliance with this policy across the EiM Group of Colleges and Schools.

- Individual College will amend this policy to reflect local context and regulations.
- The policy and appendices along with other materials and resources are available to staff on the online platform [ConnectEd](#)
- Each College will add local server hyperlinks for staff to access the related policies listed below.
- The safeguarding policy is on the website.
- The policy is reviewed in detail every 2 years and updated annually.
- We will continue to adapt and improve our policy and procedure in response to changes in local and global circumstances.

Updated: August 2021



1. INTRODUCTION

Education in Motion (EiM)'s family of schools include Dulwich College International, Dulwich International High School, Dehong, Green School International, Hochalpinen Institut Ftan, Wo Hui Mandarin and EiM Ventures.

Each EiM school is driven by the same core value, one of which is safeguarding. 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*. This policy applies to all adults visiting or working with students in our colleges and schools, including staff, volunteers, interns, gap students, contractors, consultants, board members, guests and visitors.

1.1 Our commitment

Education in Motion takes every step to ensure that students in our care are protected from all forms of abuse and neglect.

"At Education in Motion 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, Founder, Chairman & CEO, Education in Motion

1.2 Our guiding principles:

- We listen to our students and put them first
- We ensure that safeguarding is central to all we do
- We recruit safely
- We ensure that safeguarding is a standing item on all meeting agendas
- We train every adult working or volunteering in our colleges/schools/HQs
- We support the needs of individual students and recognise that some students are more vulnerable than others



1.3 Our core competencies

Through professional learning and dialogue, we ensure that staff and volunteers meet the following competencies:

1. Placing the student at the centre of all that we do
2. Understanding possible signs and indicators of abuse and neglect
3. Knowing how to respond to and communicate with students
4. Always responding to safeguarding needs
5. Understanding what might make some students more vulnerable
6. Understanding your College/School/HQ Safeguarding policy, related policies and Code of Conduct
7. Knowing how to share key information safely and who to share it with

1.4 Our context

"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, Education in Motion

In all our colleges and schools our student-centred approach is modelled on the United Convention on the Rights of the Child. All of our students have a right to be safe and we draw upon best practice internationally and apply the safeguarding standards of the Council of International Schools (CIS).

2. WHAT IS CHILD ABUSE?

The NSPCC considers child abuse to be *'when a child is intentionally harmed by an adult or another child – it can be over a period of time but can also be a one-off action. It can be physical, sexual or emotional and it can happen in person or online. It can also be a lack of love, care and attention – this is neglect.'*

2.1 Categories of child abuse.

We consider child abuse under the following broad headings:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect



Indicators of Abuse and Neglect (Appendix A) gives more information on categories of child abuse and guidance on how to identify them.

This can include, but is not 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;
- 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 upskirting (taking a picture under a person's clothing without them knowing);
- initiation/hazing type violence and rituals.

2.2 Speak Out Stay Safe

We encourage students to report when they have been abused, neglected or made to feel uncomfortable by adults or peers in school or outside. We are committed to responding to any reports from students about their own wellbeing or that of peers.

The College ensures that regular learning opportunities are delivered to students to recognise, resist and report peer on peer abuse or abuse/neglect by adults. This will be delivered at the beginning of each academic year as part of the *Speak Out Stay Safe* learning framework but also revisited regularly throughout the year.

3. HOW DO WE KEEP OUR COMMUNITY SAFE?

3.1 Key safeguarding roles and responsibilities

Safeguarding is the responsibility of all staff. Managers lead their departments in implementing, embedding and improving child safeguarding.

Key safeguarding roles and responsibilities are listed below. Photos and contact details are given on posters in our College and can also be found by staff on ConnectEd. Important telephone numbers are listed on the back of staff lanyards. Visitor lanyards direct them to the school office/reception in case of any concern, who will direct them to the appropriate person.



Role	Person
EiM Chief Education Officer	Lesley.Meyer@eimglobal.com
Head of College	mike.oconnor@dulwich.org
Designated Safeguarding Lead	shirley.wan@dulwich.org
Deputy Designated Safeguarding Lead	julie.mackie@dulwich.org
Child Protection Officer	shirley.wan@dulwich.org georgina.gray@dulwich.org mark.jones@dulwich.org
Deputy Child Protection Officer	stuart.janes@dulwich.org glory.goh@dulwich.org david.wheatley@dulwich.org
Local Staff Focal Point	tracy.wu@dulwich.org judy.li@dulwich.org
Safeguarding Lead Trainer	julie.mackie@dulwich.org judy.li@dulwich.org jess.byrne@dulwich.org david.wheatley@dulwich.org
E-Safety Lead	ben.widdowson@dulwich.org glory.goh@dulwich.org

Detailed job descriptions are given in in *Key safeguarding roles and responsibilities (Appendix B)*. These descriptions are added to individual HR files. Below are brief summaries.

Head of College:

- implements the safeguarding action plan based on most recent audits and other scrutiny;
- ensures that the safeguarding policy is adapted to local context and followed by all;
- responds to concerns about the actions of staff or volunteers.



Designated Safeguarding Lead (DSL):

- manages Safeguarding concerns;
- coordinates and supports the two-year audit cycle and safeguarding action plan;
- creates reports if staff members have needed to use force with a student.

Deputy Designated Safeguarding Lead (DDSL)

- supports all of the above and takes responsibility in the absence of the DSL.

Child Protection Officer (CPO)

- manages the College response to safeguarding and child protection;
- manages disclosure, reporting and recording concerns about students;
- takes the lead on individual cases and liaises with all relevant parties

Deputy Child Protection Officer (Dep CPO):

- is aware of all cases;
- takes on all of the CPO responsibilities on the absence of the CPO.

Safeguarding Lead Trainer:

- leads safeguarding training;
- liaises with other safeguarding trainers across EiM;
- trains other staff to become safeguarding trainers.

Safeguarding Trainers:

- receive EiM *Train the Trainer* Training
- deliver DCI and College -based safeguarding learning as requested
- attend meetings led by the College Lead Trainer

3.2 Safeguarding Working Party

The Safeguarding Working Party is composed of the following roles:

- The Designated Safeguarding Lead (DSL) - who chairs the meetings and reports directly to the Head of College.
- Child Protection Officer(s).
- Lead Trainer(s).
- The E-Safety Lead.
- Other representative staff selected by the DSL and the Head of College.

The Safeguarding Working Party meets at least three times a year to:

- monitor safeguarding practices across the College;



- develop an action plan covering practices and development relating to most recent audits or compliance reviews;
- oversee professional learning with regards to safeguarding;
- review every year the Safeguarding Policy and recommend updates.

3.3 Disclosure, reporting and recording

The College will ensure that all members of staff and employees are familiar with the procedures for keeping a confidential record of any incidents. We encourage a culture of safe reporting for all members of our community, including concerns about peer-on-peer abuse, either online or in person.

Members of staff and volunteers should not investigate; staff or volunteers who believe that a student may be at risk must immediately refer concerns to the CPO.

When managing concerns, we consider:

- each student's developmental needs;
- the role and responsibilities of those involved;
- 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 students are vulnerable, but not at significant or immediate risk of harm.

All adults working in, volunteering or visiting our colleges/schools must report concerns immediately. They must maintain confidentiality and follow the reporting procedure (*Appendix H*).

CPOMS (a digital platform) is used for reporting, recording and monitoring both child protection and safeguarding concerns. Incidents and concerns are added directly to CPOMS for staff with access to CPOMS or recorded on a Record of Concern form (*RoC Appendix C*) for those without. The CPO will scan and upload Records of Concern to CPOMS on their behalf.

Staff are expected to submit safeguarding incident/concern reports that are student-centred, in the student's best interests, rooted in child development and informed by evidence. They must feel confident that they will be supported if they report concerns about a student.

On receipt of a specific child protection concern, the CPO will ensure that the Head of College and the DSL are alerted. On receipt of a less urgent safeguarding concern, the CPO will consult with the DSL to ensure that the appropriate strategy is agreed and implemented. This may involve seeking



further advice from Lesley Meyer, the EiM Chief Education Officer or in her absence, Kate Beith, the EiM Safeguarding Consultant kate.beith@eimglobal.com.

In all serious child protection incidents, Lesley Meyer, the EiM Chief Education Officer must be informed or in her absence, Kate Beith, the EiM Safeguarding Consultant kate.beith@eimglobal.com.

It is the responsibility of the EiM CEo to ensure that the CEO is kept informed on a regular basis and involved in serious matters.

3.4 Managing concerns about a student

It is the responsibility of the CPO to manage the process. All relevant information relating to actions and communications will be sorted on CPOMS.

The Head of College may instruct the CPO to gather a response team to assess a reported child protection concern. The participants chosen 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.

Involvement of College Social/Emotional Counsellors to support students and/or families must be considered but should not be automatic. In many cases, but not all, counselling will help and CPOs must meet frequently with counsellors to facilitate support when needed. In cases where there is significant engagement with College Counsellors, the CPO need to ensure that any relevant counselling files are added to CPOMS.

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 EiM Chief Education Officer who may consult with a member of the EiM legal department.

Upon advice from the EiM Chief Education Officer, the College will report to law enforcement agencies instances of child protection concerns and submit all relevant documentation, if required by local laws and regulations. All adults working in, volunteering or visiting EiM colleges/schools will 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 a coherent time-frame will be recorded along with the impact of any decision on the welfare of the student

3.5 Confidentiality

The College will ensure that all data relating to all students is confidentially managed on CPOMS in accordance with the requirements of EiM and national or local laws or regulations.

Those reporting safeguarding concerns will adhere to the lines of communication, ensuring confidentiality. The CPO will support the process and staff will be given detailed information about lines of communication when joining 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 confidentiality, any member of staff who has reason to believe that a student is at immediate or significant risk of harm, must pass on information to the CPO.

Unless otherwise expressly required by local laws or regulations, volunteers and visitors are not authorised to take action; their roles are strictly limited to reporting if they are concerned or have witnessed any concerning behaviour while in the College.

CPOMS allows for staff members in positions of responsibility for safeguarding to be blocked from viewing their own child(ren's) records. This is recommended in order to maintain confidentiality. If this situation arises, a senior member of staff will be identified to ensure continuity of care.

3.6 Transferring child protection files

When a student with an active child protection file moves to another school, there is a moral duty to inform the school about any issue about which they should be aware.

The College must check the legal requirements of the country in which they are operating. The first duty is to protect the student; if in doubt it is better to telephone the future school and raise a concern. Further guidance can be sought from the EiM Education Officer, Lesley Meyer.

There is a duty to talk to the Head of College about a significant issue. It is not appropriate to leave information with another member of staff, including admissions.



The Head of College must make a phone call and make a note of the conversation on CPOMS, to include:

- the date and time of the call;
- the position of the person receiving the call;
- who the call was made to;
- the nature of the communication.

Before transferring any child protection information legal requirements must be checked.

3.7 Retention and review of files

It is generally good practice to share information with parents. If a parent makes a request to access the file on the child's behalf, it should be done in writing in accordance with the applicable College policy including the Data Protection Policy.

Information can be withheld if disclosure:

- could cause serious harm or is likely to cause serious harm to the physical or mental health or condition of the child or another person;
- could reveal that the child or another person has been a subject of or may be at risk of child abuse, and the disclosure is not in the best interests of the child;
- is likely to prejudice an ongoing criminal investigation;
- about the child also relates to another person who could be identified;
- has been given by another person who could be identified as the source.

Subject to applicable laws, there may be circumstances under which parents may be refused access to the child protection files.

The school must always take advice from the EiM Safeguarding Lead, Lesley Meyer, about sharing information with parents if they have particular concerns about doing so.

All file documentation relating to concerns about a student or adult will be kept indefinitely in a secure file on CPOMS in case it is required as future evidence.

The Head of College will regularly monitor current child protection cases on CPOMS with the CPO.

3.8 Early help and local resource mapping

The College will ensure that any internal, cross college, local, national or international sources of support are identified through the local resource 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. Resource mapping is a dynamic process that helps to identify local sources of support. The resource mapping tool is regularly checked and updated as circumstances change.



3.9 Risk assessments

Rigorous risk assessments are undertaken to ensure safety for students when they participate in educational visits or other significant events. Details of the process for trip planning are to be found in the College Educational Visits (trips) policy.

3.10 Reflection, reviewing and evaluating for impact

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

The College will be alternately internally and externally audited on a two-year cycle. The internal audit uses the EiM Internal Audit Protocol (*Appendix K*) and is carried out by the Head of College and the DSL. The findings of the audit will be discussed in an online meeting with the EiM 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 College trained auditors
- The Head of College
- Designated Safeguarding Lead
- The EiM Chief Education Officer

The Head of College will ensure that the Safeguarding Working Party, chaired by the DSL, will meet at least three times a year to review the action plan. The DSL will also discuss the plan with the Head of College at their regular safeguarding meetings, and the Head of College will report progress at each meeting of the Board of Management. The EiM safeguarding consultant will meet with each college safeguarding working party annually to review compliance (*Appendix J*).

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

4.1 Safer recruitment

To ensure that students are protected while at the College, all staff will be carefully selected, screened, trained and supervised. More details of procedures followed can be found in the **EiM Safer Recruitment Policy**.

4.2 Professional safeguarding learning

The College has a Safeguarding Training Team consisting of:



- at least two lead safeguarding trainers (one fluent in English, and one fluent in the local language);
- an appropriate number of Safeguarding Trainers.

All training supports staff in ensuring that they meet the required EiM Safeguarding Competencies. All training materials will be kept in a designated central location. The Professional Learning Director will support the safeguarding training programme.

There is a commitment to delivering face to face training but when required due to the Covid-19 pandemic, online initial training will be delivered. Training is evaluated every year.

For contractors, volunteers and others, safeguarding training will be organised as required and delivered by safeguarding trainers. Training requirements for every staff member can be found in the *EiM Competency and Training Framework (Appendix E)*.

4.3 Code 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 *EiM Safeguarding Code of Conduct (Appendix D)*. This will be re-signed annually by all staff.

4.4 Volunteers, visitors and contractors

A volunteer is someone with specific skills who spends regular time in the College. Examples of volunteer roles include:

- Class helpers or readers
- Trip support
- Mentors
- Friends of Dulwich (FoD) members
- Gap students or interns

It is recognised 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 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 receive the relevant level of safeguarding training and sign the Safeguarding Code of Conduct. 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 sign the *Volunteer Safeguarding Statement (Appendix F)*.

A visitor is someone who spends a short amount of time, through appointment at the College, with a very specific short-term remit. The College maintains 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 (*Appendix G*).

The College will ensure that all service providers and contractors they work with (with a very specific remit, confirmed by contract, and for the purposes of self-employment) must sign the a *standard supplier agreement* 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. A copy of the safeguarding policy will be included in all such contracts.

4.5 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 EiM procedure for managing allegations will be followed as outlined in the *Management of Safeguarding Allegations Policy and Appendix I*.

4.6 Safeguarding whistleblowing guidance

A staff member, volunteer or visitor 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. All adults are encouraged to ensure that students are their priority and should not be unnecessarily at risk. This is known as 'whistleblowing' when adults are encouraged to speak up and speak out.

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

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 EiM Chief Education Officer, Lesley Meyer or the EiM CEO, Fraser White.

- If a concern is expressed about the Head of College, it should be referred to the EiM Chief Education Officer, Lesley Meyer or the EiM CEO, Fraser White.
- If a concern is expressed about the EiM Chief Education Officer, it should be referred to the EiM CEO, Fraser White.

4.7 Self-reporting

A member of staff may have a personal difficulty that impinges 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. While such reporting will remain confidential in most instances, this cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of students.

Staff may seek advice or self-report if they feel compromised as parents of the College in any aspect of safeguarding.

Students may develop an infatuation with an adult. If a staff member or volunteer suspects this, they must report it to their line manager and the CPO who will decide on the best way to proceed and give advice accordingly.

4.8 Safe touch

There are occasions when physical contact with a student is appropriate. 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;
- giving first aid treatment.

Students should always be notified that touch is going to happen.

On rare occasions, a staff member may have to make a physical intervention to avoid injury to property or individuals. 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.



Staff should use their professional judgment, considering their own safety before making the decision to physically intervene. The priority is to de-escalate any situation through talking, the use of body language and giving a calm but firm response. Staff should have exhausted their skills to de-escalate the situation through non-physical methods before resorting to any form of physical intervention.

A Record of Concern on paper or a direct entry onto CPOMS should be completed immediately when a staff member has to physically intervene to de-escalate a harmful situation.

The CPO will conduct a debrief with the relevant parties before the end of the working day and add a summary report to CPOMS.

If a particular student requires physical intervention as part of an individual care plan, this can only be delivered by a staff member who has received specific training in this area. Contractors, volunteers or other visitors should never initiate any physical intervention but instead make immediate contact with a member of staff.

Further guidelines are available in the *College Safe Touch policy*. Specific briefings are provided for departments such as PE/Swimming, Dance/Drama, Music and Early Years. Attendance must be recorded.

Specific 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.

5. E-SAFETY

The safe use of equipment, applications and systems is central to the College IT policy. Monitoring and appropriate actions are taken where issues are identified. The College is committed to ensuring a safe digital learning community through curriculum plans, professional development, auditing of systems and working with parents. This approach is described in an E-Safety policy and supported by our E-Safety Lead.

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. It is recognised that online learning can break down barriers and that students may speak more freely. It is important that clear guidance be given to staff, students and parents.



Staff, students, parents, visitors and volunteers are expected to engage in the safe and responsible use of social media. Any member of staff who 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.

We acknowledge 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. However, parents are expected to be mindful of sharing photos on social media, especially if other students are visible or if the College can be identified.

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

Staff are expected to take photos of students for educational purposes (such as Tapestry, Seesaw etc.) on College devices. In the unlikely event of taking photos on personal devices, these images must be deleted immediately after being uploaded to school drives.

Appendices

- A. Indicators of Abuse and Neglect
- B. Key Safeguarding Roles and Responsibilities
- C. Confidential Record of Concern (RoC)
- D. Safeguarding Code of Conduct
- E. EiM Competency and Safeguarding Training Framework
- F. Volunteer Safeguarding statement
- G. Visitor Safeguarding statement
- H. Flow chart *reporting a concern about a student*
- I. Flow chart *managing allegations reporting about an adult*
- J. EiM Safeguarding Compliance Review
- K. EiM Internal Audit protocol

Safeguarding Related Policies

The following related policy documents can all be accessed by staff via local hyper-links to the College server.

- Anti-bullying Policy



- Behaviour Management Policy
- CCTV Surveillance Policy
- Management of Safeguarding Allegations Policy.
- Safe Touch Policy (including de-escalation strategies)
- Recruitment Policy
- Health and Safety 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
- Speak Out Stay Safe Learning Framework
- Standard supplier agreement