

Dulwich College Shanghai Pudong

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: October 2020



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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 the 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
Head of College	Caroline Taylor caroline.taylor@dulwich-shanghai.cn
Designated Safeguarding Lead	Katherine Weir-Davis katherine.weir-davis@dulwich-shanghai.cn
Deputy Designated Safeguarding Lead	Vicky Foster victoria.foster@dulwich-shanghai.cn
Child Protection Officers	DUCKS - Katherine Weir-Davis katherine.weir-davis@dulwich-shanghai.cn Junior School - Vicky Foster victoria.foster@dulwich-shanghai.cn Senior School - Alison Derbyshire alison.derbyshire@dulwich-shanghai.cn
Deputy Child Protection Officer	DUCKS - Cathy Taylor catherine.taylor@dulwich-shanghai.cn Junior School - Simon Underhill simon.underhill@dulwich-shanghai.cn Senior School - Will Hutchings william.hutchings@dulwich-shanghai.cn
Local Staff Focal Point	Helen Zhang



	helen.zhang@dulwich-shanghai.cn
Safeguarding Lead Trainer	Tony Pickhaver (Interim)

Responsibilities of the DSL and CPO

Designated Safeguarding Lead (DSL)

- manages safeguarding concerns
- 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

The 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 or Deputy 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 on 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 a safe place. 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 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 the student file, to include the date and time of the call, who the call was made to, their position in the College and the nature of the communication.

If there is a significant issue to report, there is a duty to call the Head of College 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 separately in a fireproof safe. The Head of College will regularly monitor all current child protection files 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 through 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 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.



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 College HR Department.

Training schedules will be posted online via the College email platform 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 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 College'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: [Whole College Learning Support](#)

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 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 College/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

上海德威外籍人员子女学校（浦东）

学生安全保障政策

本政策由德威国际教育集团（下文简称“**德威集团**”）首席教育官、德威学生安全保障顾问及德威安全保障专员联合编写，须提交德威集团决策委员会(Group Executive Board)进行年度最终审批。

各校依当地法规或具体情况对本政策进行修订。

德威首席教育官将确保德威集团旗下各所学校均遵守本政策规定。

更新日期：2020年10月



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政策链接与附件

德威员工点击本文件中的相关超链接,即可跳转至 [ConnectED](#) 网站 [My Safeguarding](#) 页面,查阅更多信息。



1. 引言

学生安全保障即指由学校提供一个安全有效的环境，使所有德威学生都能充分发展、安心学习。

我们的学生安全保障措施同样适用于参观德威各校或工作内容涉及德威各校学生的所有成年人，包括全体员工、志愿者、实习生、间隔年学生、承包商、顾问、校董事会成员、客人和访客。

1.1 德威的承诺

我们将在各方面采取一切措施来确保德威的学生不受任何形式的虐待和忽视。

“在德威国际教育集团，我们坚信：学生安全保障，人人有责。德威各所学校中与学生及学生家长接触的每一个人都发挥着重要作用。为有效提供安全保障，德威全体员工和志愿者应务必确保始终如一地将学生的最大利益作为首要问题考虑，把学生的需要放在第一位。”

[Fraser White](#)，德威国际教育集团董事长

1.2 德威的指导原则

下列指导原则是我们兑现安全保障承诺的基石：

- 听取学生的意见，把学生放在首位
- 确保一切工作始终以学生安全保障为中心
- 确保逢会必讲学生安全保障
- 招聘人员安全为先
- 德威国际学校/德威国际高中的每一位成年员工或成年志愿者都必须接受安保培训
- 注重学生个人需求，理解部分学生可能比其他学生更敏感脆弱

1.3 德威的核心竞争力

我们将通过专业学习和沟通，确保所有员工和志愿者都具备以下能力：

1. 凡事始终以学生为中心
2. 及时发现虐待和忽视学生的迹象和信号
3. 知晓如何回应学生需求以及如何与学生交流
4. 持续响应学生安全保障需求
5. 了解可能造成某些学生更敏感脆弱的原因
6. 了解所在学校的《学校学生安全保障政策》，以及其他相关政策及《行为准则》
7. 知晓如何安全地分享关键信息以及分享对象



1.4 德威所处的环境

我们认为，每个学生都有权利感到安全；我们以学生为中心的学生安全保障措施是以《[联合国儿童权利公约](#)》为蓝本制定的，同时借鉴了国际上最行之有效的操作方法。

“各德威国际学校和德威国际高中有一套共通的方法和标准为学生提供安全保障。但是，我们也尊重每所学校不得不考虑其所处文化环境以及任何地方性或国家级法律法规的事实。”

[Lesley Meyer](#)，德威国际教育集团首席教育官

德威在中国、韩国、新加坡和缅甸均设有国际学校和国际高中。

我们遵守学生安全保障方面的地方性和国家级法律法规要求，同时也符合国际学校理事会（CIS）的[所有标准](#)。

我们确认新冠病毒疫情已使学校对学生安全保障程序开展审查，我们也将必要时修改本政策内容。

德威国际学校及国际高中不向学生提供家庭寄宿服务。

2. 何谓虐待儿童？

2.1 虐待和忽视儿童的迹象：附件 A；[Dulwich ConnectED](#)

在德威学校中，虐待和忽视迹象包括：

- 身体虐待
- 精神虐待
- 性虐待
- 忽视

相关定义和更多详情，可登录 [Dulwich ConnectED](#) 查看

3. 如何保障社区安全？

3.1 主要责任

德威集团及德威国际学校和德威国际高中内部的主要职责和责任详见下表。各关键人员的照片公布在 [Dulwich ConnectED](#) 上，其详细个人信息张贴在校内相关各处。重要电话号码（用于报告情况）印在每条工作挂绳背面。

每所学校均设有特定的学生安全保障岗位，具体信息如下：



岗位	人员
德威学生安全保障总监 (理事会(Board of Management)代表)	Lesley Meyer lesley.meyer@indulwich.com
校长/项目总监	Caroline Taylor caroline.taylor@dulwich-shanghai.cn
学生安全保障专员 (DSL)	Katherine Weir-Davis katherine.weir-davis@dulwich-shanghai.cn
副学生安全保障专员	Vicky Foster victoria.foster@dulwich-shanghai.cn
儿童保护官 (CPO)	<p>幼儿园 - Katherine Weir-Davis katherine.weir-davis@dulwich-shanghai.cn</p> <p>小学部 - Vicky Foster victoria.foster@dulwich-shanghai.cn</p> <p>中学部 - Alison Derbyshire alison.derbyshire@dulwich-shanghai.cn</p>
副儿童保护官	<p>幼儿园 - Cathy Taylor catherine.taylor@dulwich-shanghai.cn</p> <p>小学部 - Simon Underhill simon.underhill@dulwich-shanghai.cn</p> <p>中学部 - Will Hutchings wiliam.hutchings@dulwich-shanghai.cn</p>
本地协调员	Helen Zhang helen.zhang@dulwich-shanghai.cn
学生安全保障总培训师	Tony Pickhaver (临时)



德威国际教育集团

学生安全保障专员和儿童保护官的各项责任

学生安全保障专员（DSL）的具体责任如下：

- 管理学生安全保障问题；
- 收集问题记录，并在员工使用正当武力以降低伤害风险的情景做出指示；
- 以每两（2）年为一个周期开展审计。

儿童保护官（CPO）的具体责任如下：

- 管理儿童保护方面的问题；
- 管理学生问题的披露、报告和记录事宜。

总培训师的具体责任如下：

- 组织开展内部培训
- 培养员工培训师

每所德威国际学校和德威国际高中均设学生安全保障工作组，工作组由其各部门代表组成，包括：

- 学生安全保障专员（DSL）
- 儿童保护官（CPOs）
- 总培训师
- 电子安全/信息技术负责人

学生安全保障专员将担任工作组组长，并直接向校长/项目总监汇报工作。德威国际学校和德威国际高中学生安全保障工作组的职责如下：

- 监控德威国际学校和德威国际高中内的学生安全保障工作
- 就与年度审查相关的操作实践和战略发展，制定行动计划
- 监督学生安全保障方面的专业学习情况

该工作组至少每年召开一次会议，审阅德威集团的政策并提出更新建议。

3.2 披露、报告和记录

我们通过 CPOMS（数字化平台）来记录和监督儿童保护相关问题。在某些情形下，员工还可以使用 ConnectED 上的《附件 C》——届时将由儿童保护官或副儿童保护官上传至 CPOMS 平台。



德威国际学校和德威国际高中采取系统性方法对问题进行管理，同时考虑下列因素：

- 每位学生的发展需求
- 照顾学生的员工应负的注意义务
- 家庭和环境因素

我们将问题分为以下两类：

- **儿童保护问题**，即学生处于重大或直接伤害风险中
- **学生安全保障问题**，即学生可能受到伤害，但尚未处于重大或直接伤害风险中

收到儿童保护问题报告后，儿童保护官将通知校长/项目总监，并视情况通知或咨询学生安全保障专员。

出现学生安全保障问题时，儿童保护官将向学生安全保障专员进行咨询，以确保商定并贯彻适当的策略。学生安全保障问题应汇报校长/项目总监。

如无法联系到校长/项目总监，或者相关问题涉及到校长/项目总监，则应将问题直接上报给：

Lesley Meyer: 德威集团首席教育官

或者，在无法联系到德威集团首席教育官时，联系：

Kate Beith: 德威集团学生安全保障顾问

学生问题的披露、报告和记录

德威学校的任何成年员工、志愿者或访客一旦发现任何问题，必须立即上报。上述人员应对问题予以保密并立即上报给已确定身份的儿童保护官或副儿童保护官。上报人需在问题保密记录表中（可向儿童保护官索要该表）录入具体问题（参见附件C；[Dulwich ConnectED](#)）。

儿童保护官也将记录并管理与学生安全保障和同伴虐待相关的任何问题（参见附件D；[Dulwich ConnectED](#)）。学校将始终严肃对待和处理此类问题。

儿童保护官有责任采取进一步措施。所有文件将存放在安全地点。员工应有信心，在其报告学生所遭遇的任何问题后，其将会获得支持。员工应当确保与任何学生安全保障情形相关的报告均以学生为出发点，符合学生的最佳利益，植根于学生发展需要，并且有据可考。

校长/项目总监可指示儿童保护官组建一支响应团队，对上报的儿童保护问题进行评估。团队成员的人选取决于具体事件的性质。响应团队将采用一套全局性的方法，解决学生在家庭、学校、范围更广的社区内，以及在当地或国际环境下的各项需求。



德威国际学校/德威国际高中必须慎重考虑与以下有关的地方性法律法规中的报告要求：疑似家庭暴力事件，以及未成年人身心健康受到严重伤害或未成年人面临非法侵害风险的任何其他情形（即未成年的人身权、财产权或其他权利受到侵害）。一旦发生可能产生报告义务的情形，应立即征求德威集团首席教育官的指导意见，德威集团首席教育官可继而咨询德威集团法务部人员的意见。德威集团首席教育官出具意见后，当地法律法规如有要求，德威国际学校/德威国际高中应将儿童保护问题事件向执法部门汇报，并提交所有相关文件。德威学校的所有成年员工、志愿者或访客均应根据当地法律法规全力配合执法部门的工作。

响应团队作出决策前应尽可能取得学生及学生家长的同意，并应明确记录评估流程和时间表，同时记录对学生的身心健康产生的变化和影响。

3.3 保密

德威国际学校/德威国际高中及其全体员工将确保根据德威以及相关国家或地方性指导方针、法律或法规的各项要求对所有学生数据进行保密管理。

上报学生安全保障问题的人员应遵守信息上报通道方面的要求，以确保问题的保密性。儿童保护官将为约定的上报流程提供支持，德威国际学校/德威国际高中也将在入职培训过程中以及每一学年开始时提供详细的上报通道信息。

对学生和/或学生家长的保密信息拥有访问权限的任何员工都必须采取一切合理的措施维护该等信息的保密性。校长/项目总监和儿童保护官将就此类信息的处理商定适当的后续措施。

任何员工（无论是否负有保密义务）如有理由认为某名学生处于直接或重大伤害风险中，都有义务毫不迟疑地将以上信息传达给儿童保护官。除非地方性法律或法规另有明确要求，否则志愿者和访客都无权采取任何行动；若任何志愿者或访客在校期间有涉入其中或目睹任何相关行为，其职责仅限于履行报告义务。

3.4 转移儿童保护档案

如儿童保护档案中留有记录的学生转学到其他学校，德威国际学校/德威国际高中应履行明确的道德义务，告知或尽力告知该校其应了解的问题。

学校必须清楚了解其运营所在国家的各项法律要求；如法律规定不明确的，在存在儿童保护相关问题时，校长/项目总监必须通过电话（而不是直接转移文件）的方式告知新学校。

校长/项目总监必须将通话内容录入学生档案中，包括通话日期和时间、接听人员及其在校职务，以及通话性质。



德威国际教育集团

报告重大问题时，报告人有义务致电校长/项目总监或者学生安全保障专员；将信息留给其他员工处理并不妥当。

德威国际学校/德威国际高中的首要义务是保护学生（*把学生放在首位*），如有任何疑惑，最好通过电话提出。如需进一步指导，可随时向德威集团首席教育官（如首席教育官不在，可向德威集团学生安全保障顾问）寻求帮助。

- 档案必须以安全的方式永久保存。
- 学生档案不得转移到其他学校。
- 校长/项目总监可致电（或提议致电）接收学生的新学校，并将任何学生安全保障问题的最新进展告知新学校。

3.5 档案的保留和审查

记录学生或成年人相关问题的所有档案资料将无限期地单独存放在防火保险箱内。校长/项目总监将定期与各位儿童保护官共同监督所有现存儿童保护档案的存档情况。

3.6 早期帮助

德威国际学校/德威国际高中将确保收集校内、跨校、当地、国内或国际范围可提供帮助的资源。如果出现显见的早期迹象表明学生正面临安全或健康危险，学校可安排联络人为学生及其家庭提供相应支持。

德威国际学校/德威国际高中将确保全体员工都熟悉安全事件书面保密记录的各项程序（[见附件C：Dulwich ConnectED](#)）。

员工和志愿者无须也不得私自调查；如其认为学生可能处于风险中，应立即将相关问题上报儿童保护官。

德威国际学校/德威国际高中鼓励为学校社区所有成员营造安全报告氛围的文化，包括报告同伴虐待问题（无论通过网络实施还是当面实施）。

3.7 同伴虐待

全体员工都应意识到学生之间也可能出现虐待行为（通常称为同伴虐待），同伴虐待最有可能包括的行为如下（但不仅限于该等行为）：

- 霸凌（包括网络霸凌）
- 身体虐待，如打、踢、摇晃、咬、扯头发或以其他方式造成身体伤害；
- 性暴力，如强奸、插入式侵犯和性侵犯；



- 性骚扰，如带性暗示意味的评论、言语、玩笑和网络性骚扰，可能单独发生或涵盖在其他形式的虐待行为中；
- 偷拍裙底，通常指在受害人不知情的情况下把镜头伸到女性裙底，试图偷拍女性生殖器或臀部，以此获得性快感或令受害人感到羞辱、痛苦或惊慌失措；
- 色情短信（即未成年人发送性、裸露或半裸照片或视频）；以及
- 入会仪式/欺辱类暴力和宗教仪式。

2020 年儿童安全教育

德威国际学校/德威国际高中确保开展定期学习，尽可能减少同伴虐待的发生。同时，必须确保学生知道如何识别成年人或同伴的哪些行为是不可接受的，并有信心报告可能存在的任何问题。学校每年将通过 [Speak Out and Stay Safe](#) 的主题学习提供这方面的教育。

3.8 更安全的招聘程序

为确保学生在校期间受到保护，我们会采取更谨慎仔细的态度对员工进行挑选、筛查、培训和监督。

有关更安全招聘政策的更多详情，请参见发布在 [Dulwich ConnectED](#) 上的《德威招聘政策》。

3.9 学生安全保障专业学习

德威国际学校/德威国际高中拥有一支学生安全保障培训团队，成员组成如下：

- 两（2）名学生安全保障主培训师（其中一名英文流利，另一名本地语言流利），以及适当数量的学生安全保障培训师。
- 德威国际学校/德威国际高中的专业教学主管应为学生安全保障培训项目提供支持。

所有德威培训项目都有助于员工确保其符合德威的学生安全保障能力要求。

每所学校员工的培训要求请参见《德威能力与培训框架》（参见附件 E；[ConnectED](#)）。

有关学生安全保障培训师职责的更多详情，请参见附件 B；[Connect ED](#)。学生安全保障培训师的职责描述将添加到每一份岗位说明书中，从而将该等职责列为专业审查流程的一部分。

供各培训师使用的所有培训资料将保存在 TEAMS 的指定重要位置。其他资源可登录 [ConnectED](#) 查看。

德威国际学校/德威国际高中一直致力于线下培训，但因当前新冠疫情的严峻形势，员工参加入职培训时可能正在隔离，故 2020/21 年首次培训将改为线上培训。



培训人员还可以通过 www.educare.co.uk 获取数量有限的培训辅助材料。登录账号和密码由德威国际学校/德威国际高中人力资源部提供。

培训时间表将发布在学校网站上或通过 [Dulwich ConnectED](#) 发布。

学校将于每一学年结束时对培训成果进行评估，为未来发展提供指导意见。更多详情以及员工和志愿者的培训资源，可在 [Dulwich ConnectED](#) 上查看。

3.10 对安保事件影响的反思、回顾与评估

年度学生安全保障审查和审计合规审查

第一学期，德威国际学校/德威国际高中将召开德威集团首席教育官和德威安全保障顾问会议，会上使用德威学生安全保障合规审查方案商讨审查工作。经会议确定需要采取的任何行动都将纳入学校的学生安全保障行动计划中。

以每两（2）年为一个审计周期

学校将以每两（2）年为一个周期交替开展内外部审计工作。

校长/项目总监和学生安全保障专员将根据《德威集团内部审计方案》开展内部审计工作，并与德威审计顾问召开线上会议，讨论相关审计结果。

外部顾问将根据商定的方案开展外部审计工作。根据审计结果制定的行动计划由以下人士签字确认：

- 德威审计员
- 校长/项目总监
- 学生安全保障专员
- 德威集团首席教育官

校长/项目总监将确保由学生安全保障专员主持工作的学生安全保障工作组每年召开三次会议，对该行动计划进行审阅。

学生安全保障专员将在其定期学生安全保障会议上与校长/项目总监共同讨论行动计划，并且校长/项目总监将在每场理事会(Board of Management)会议上汇报工作进展。

3.11 学生学习

为使所有年级的学生都能保护自身安全，德威国际学校/德威国际高中会在每一学年的前六周为学生提供学习资料，教导学生自我保护策略。为此，德威国际学校/德威国际高中将使用 [Speak Out and Stay Safe](#) 学习框架。



4. 员工、志愿者及访客的职业行为与个人行为

4.1 行为准则

学校有义务确保员工在与学生接触过程中秉承其职业行为准则，并且所有员工都应清楚何为适当行为，以及其职业界限在哪里。

学校将基于《行为准则》开展入职培训。培训结束后，所有入职人员将签署《[德威学生安全保障行为准则](#)》，并且每年重签一次（见附件F：[Dulwich ConnectED](#)）。

4.2 志愿者、访客和承包商

我们认识到有些不适合从事儿童相关工作的人士可能会通过志愿者活动接近学生。校长/项目总监将确保对长期志愿者（包括间隔年学生和实习生）进行风险评估，并确定是否进而对其进行犯罪记录核查和身份核查。所有长期志愿者还将接受相关级别的学生安全保障培训，并签署《学生安全保障行为准则》（见附件F：[Dulwich ConnectED](#)）。相关内容将进行单独集中记录（SCR）。

临时前来帮忙的家长或其他志愿者必须接受员工的直接监督，不得与学生私下接触。此外，还必须签署《志愿者学生安全保障声明》（见附件G：[Dulwich ConnectED](#)）。

德威国际学校/德威国际高中应为所有访客准备一份《学生安全保障指南》。所有校园访客都需要在拿到访客通行证之前通读《学生安全保障声明》。

德威国际学校/德威国际高中将确保与其合作的所有服务提供商和承包商都必须签署《德威标准供应商协议》（见附件N），使服务提供商/承包商承担以下保证义务：(i) 其人员并无任何犯罪或暴力记录或者任何不当行为；(ii) 服务提供商/承包商对其人员已有一定时间的充分了解；并且 (iii) 其所有人员都将签署《学生安全保障行为准则》并接受现场监督和适当培训。

4.3 针对员工、志愿者或委员会成员的指控

当员工或其他成年人遭到指控时，无论指控人是学生还是另一名成年人，都应遵循[《关于学生安全保障问题及员工行为相关指控的管理政策》](#)中列明的德威指控管理程序。

4.4 学生安全保障事件举报指南

出现反常现象时员工可能会有所察觉，但出于同事间的信赖或害怕遭到骚扰或伤害使其深感无力对此提出疑虑。我们鼓励所有成年人都将学生放在首位，并保护学生免遭不必要的风险。因此遇到相关问题，应进行“举报”。



举报理由：

- 对于损害学生安全和身心健康的任何不可接受的做法或行为，每个人都有责任提出疑问。
- 防止问题加重。
- 保护校内其他学生免受伤害风险或降低对其的伤害风险

如何提出疑问：

- 提出疑问应当尽早。只有越早提出，才能越快采取行动。
- 提出疑问时应明确说明疑问所针对的行为和提出的理由。
- 提出疑问的人士应立即联系校长/项目总监，在无法联系到校长/项目总监时，应立即联系德威集团首席教育官Lesley Meyer或德威集团董事长Fraser White。
- 相关问题如涉及校长/项目总监，则应上报给德威集团首席教育官Lesley Meyer或德威集团董事长Fraser White。

后续措施：

- 举报程序中指定处理相关问题的员工有权获取与调查性质和进展相关的信息。
- 德威国际学校/德威国际高中有责任保护举报员工不受骚扰或伤害，包括在适当时对举报员工身份予以保密。
- 若举报人本着善意原则提出的相关疑问经证明毫无根据，举报人不会受到任何处罚。

进一步意见和支持

众所周知，举报可能使举报人陷入困境，承受巨大压力。为此，学校将向相关员工提供意见和支持。

4.5 自我报告

有时，员工可能会遭遇其认为妨碍专业能力发展的个人困难。此时员工有责任与其直属上司讨论该情形，以获得专业和个人帮助。虽然在大多数情形下该报告行为具有保密性，但若因个人困难造成在校生的身心健康或安全问题，学校便无法保证对该自我报告行为进行保密。

4.6 安全接触

因有时需要与学生进行身体接触，所以学校人员应对德威国际学校/德威国际高中的《安全接触政策》有必要的了解。

需要与学生进行身体接触的相关情形可能包括但不限于：

- 在前往集合地点、带领学生熟悉学校环境以及学校组织出游时牵住低年龄学生的手（取决于年龄/需求）



- 安慰感到痛苦的学生（轻拍肩膀）
- 祝贺或表扬学生（握手）
- 示范如何演奏乐器
- 体育课或课外拓展课上示范运动姿势或技巧
- 提供急救治疗

尽量在进行身体接触前告知学生。

4.7 降低伤害风险

学校人员必须了解，控制潜在伤害的第一步是通过交谈、使用肢体语言并以冷静坚定的态度做出回应来降低伤害风险。

在极少数情况下，员工可能不得不突然对学生进行身体干预。员工应利用其专业判断决定是否进行身体干预，并在作出决定前首先考量其自身安全问题。员工应该充分利用其技能，尽量避免使用身体干预的方法来降低伤害风险。

仅在出现下列情形时，员工才可进行身体干预：

- 员工需要进行自卫或面临遭受人身伤害的迫切风险
- 人身伤害或重大财产损失的风险正逐渐变大

此类情形包括：

- 学生攻击员工或者学生之间互相斗殴
- 因意外、粗野动作或误用危险材料、物质或物品而导致学生造成他人人身伤害或损害或将他人置于该等风险中
- 学生受到或似乎受到酒精或非法物质的影响
- 防止学生在肢体冲突中误伤自己

身体干预措施有多种形式，可能涉及到员工的下列行为：

- 用身体隔开学生
- 阻挡学生上前
- 引导学生离开

若员工已使用正当武力降低伤害风险，应在当天放学前做好问题记录，并上交儿童保护官。

德威国际学校/德威国际高中将对其特定成年员工提供相关培训，以强化其采取合理措施保护任何可能需要身体干预的学生免受人身伤害的职责，并将此作为个人照顾计划的一部分：[学校学习支持政策](#)



5. 数字安全

电子安全是课程设置中不可缺少的一部分。

线上学习将在德威国际学校/德威国际高中认可的平台进行。线上学习期间，学生和老师可在非正式场所（即不同于常见的专业教室环境）参与教学活动。我们同时认为，线上学习可以打破壁垒，意即学生可以更加畅所欲言。德威国际学校/德威国际高中必须为员工、学生和学生家长提供明确指导，并提醒他们注意《行为准则》，这一点至关重要。

发现任何问题时，应对信息通信技术设备和系统的使用进行充分监控，并采取适当的应对措施。我们致力于通过具体课程、专业发展、制度审计、与家长合作并制定详细的电子政策等方式来创造一个安全的数字学习环境。

员工、学生、家长、访客和志愿者应以安全、负责的方式使用社交媒体。但是，任何员工如对互联网或社交媒体的使用存在任何儿童保护方面的顾虑或警觉到任何儿童保护问题，即应遵守本政策规定的信息上报渠道要求。

德威国际学校/德威国际高中了解，家长喜欢在子女参加表演、体育比赛和其他展示活动时为其拍摄照片和视频。这属于正常的家庭生活，校方不会阻止家长庆贺子女取得的成绩。

如果家长向德威国际学校/德威国际高中表明不希望子女的照片或视频出现在学校的资料、宣传册、网站、广告或新闻发布稿中，校方一定会满足家长这一要求。但是，对于家长或其他公众在学校活动上拍摄并随后通过社交媒体或其他方式分享的任何照片或视频，学校概不负责。

员工可以出于教学目的（如Tapestry, Educa, Seesaw等）使用学校器材为学生拍摄照片，但若出现极少数的使用个人设备拍摄照片的情况，照片必须立即删除。经批准的任何课程录像也应立即删除。

德威国际学校/德威国际高中已制定一项电子安全政策，员工对其中的实践操作规定应予以适当了解。



安全保障政策相关链接

下列关键政策性文件均可在学校服务器上查阅。

- 《关于安全保障问题及员工行为相关指控的管理政策》
- 《安全接触政策》
- 《正当武力使用政策》
- 《招聘政策》
- 《反霸凌政策》
- 《健康安全政策》
- 《行为管理政策》
- 《消防安全政策》
- 《封锁政策》及其他应急程序
- 《急救政策》（医疗程序）
- 《教学观摩政策》（包括风险评估）
- 《学生监督政策》
- 招生和出勤登记管理程序
- 《电子安全政策》
- 《闭路电视监控政策》

附件

- A. 虐待和忽视迹象
- B. 主要职责和责任
- C. 问题保密记录（RoC）
- D. 问题记录追踪文件
- E. 《德威能力与安全保障培训框架》
- F. 《安全保障行为准则》
- G. 志愿者安全保障声明
- H. 访客安全保障声明
- I. 学生问题报告流程图
- J. 成年人指控报告管理流程图
- K. 校长/项目总监工作清单
- L. 《德威安全保障合规审查方案》
- M. 《德威内部审计方案》
- N. 《德威供应商协议》