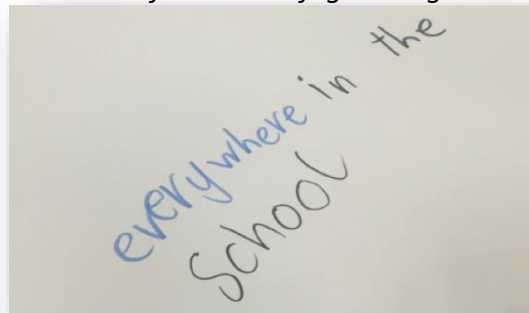**DULWICH COLLEGE** | INTERNATIONAL |

DCI

Safeguarding Framework - an introduction

Document 1 of the DCI Safeguarding Framework

This is an introduction to the DCI Framework which contains four Safeguarding documents:

1. DCI Safeguarding Framework – an introduction
2. The College Safeguarding Policy
3. The DCI Staff Safeguarding Code of Conduct
4. The DCI Management of Safeguarding Concerns and Allegations about the Conduct of Staff

Reporting documentation is available in each College

Safeguarding Framework

Contents

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1. Introduction

Dulwich College International (DCI) schools define safeguarding as the way in which we provide a safe and effective environment so that all our children can fully develop and learn. We take every step to ensure that children in our care are protected from all forms of abuse and neglect.

This Framework describes how we fulfill this duty and sets out the responsibilities of Dulwich College Management International (DCMI) and every DCI school for safeguarding and promoting the welfare of all our children. It includes policy provisions applicable to DCMI as well as directives covering safeguarding practice and procedures in all DCI schools.

The provisions of this document apply to all adults visiting or working with children in DCI schools, including volunteers, interns, contractors, consultants, board members, guests and visitors, and in this document, the term "child" refers to any student in our care, regardless of their age.

We aim to comply with local safeguarding legal requirements and to meet all standards required by the Council of International Schools (CIS), the Independent Schools Inspectorate (ISI) and the British Schools Overseas (BSO) standards.

Our commitment to Safeguarding covers:

- Child protection
- Safe recruitment and selection
- School security/physical environment
- Managing allegations
- Behaviour Management
- Partnership with parents/ caregivers
- Anti-bullying
- Peer on peer abuse
- Digital safety
- Whistleblowing
- Staff conduct
- Inclusive practice
- Special educational needs and disabilities
- Positive and preventive curriculum
- Attendance, admissions, exclusions

** This policy should be considered in conjunction with the DCI Health and Safety Framework.

2. Principles

Our Commitment to Safeguarding

We put children's safety first and take every step to ensure the safety and well-being of every child in our care. The DCI Safeguarding Framework is followed by all our schools and reflects our uncompromised commitment to this sensitive and often complicated area of our provision. Everyone who works with children has a responsibility to keep them safe.

We take a child-centred approach and believe that children should be respected and their views heard. It is our role to ensure that each child has a stable relationship with all adults, built on trust and consistent support for their individual needs. This approach should guide the behaviour of all professionals in our schools. Anyone working with children should see and speak to them, listen to what they say, take their views seriously and work with them collaboratively when deciding how to support their needs. Our child-centred approach is based on the United Nations Convention on the Rights of the Child, which protects the rights of children and provides a child-centred framework for us to follow.

We are aware that children with SEN and disabilities are vulnerable and therefore aim to provide early help by ensuring that dedicated staff identify vulnerable learners through clear assessment and individual planning procedures that identifies these young people and their individual needs, ensuring that they have the support needed to keep them safe.

3. Types of Abuse and Neglect

We define abuse and neglect as outlined in Keeping Children Safe in Education 2016 (DfE, pp.11, 12). All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

3.1 Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

3.2 . Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

3.3. Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

3.4. Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

3.5. Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

4. Roles and Responsibilities across the DCI Group

This DCI Safeguarding framework and the Safeguarding portfolio of policies and documents are implemented through the structure as outlined in this section.

The names and contact details of people leading safeguarding in each DCI school will be made available to DCMI and all members of staff at each site during the induction process.

4.1 Dulwich College International (DCI)

DCI has responsibilities at three levels:

- **Strategic** - to plan, coordinate and quality assure the delivery of services across DCI schools.

- **Support** – to promote safeguarding issues, ensure that DCI schools are aware of their safeguarding responsibilities, and facilitate links to external agencies.

- **Operational** – to ensure that all DCI schools are safe places and that safer recruitment is in place to prevent unsuitable adults working or volunteering with our children.

4.2 Designated Senior Person for DCI (DCI DSP)

Heads of College, Directors or College DSPs will be expected to report to this person, who will be the first line of communication to DCMI in any safeguarding issues regarding child protection and will ensure a consistent approach to the training and support of Designated Senior Persons (DSPs) across DCI schools.

The Director of Schools for the China region will be the designated person for any safeguarding issues in the region. He will consult with the DCI Designated person as needed.

The DCI DSP will keep the Director of Schools informed of all safeguarding matters communicated to her by the DCI schools. The DCI Director of Schools will keep the Chief Executive of DCI and members of Ex-com informed as appropriate.

They will:

- Framework and Policy Development
  - Ensure schools are updated on policy changes.
  - Ensure each school follows the agreed DCI safeguarding lines of communication for child protection and managing allegations.

- Safer Recruitment
  - Ensure that Safer Recruitment standards are followed.
  - Ensure that schools maintain a central register

- CPD and Professional Learning
  - Ensure that everyone working for DCMI/DCI has access to the appropriate level of Professional Learning in safeguarding.
  - Ensure attendance at updated Professional Learning.
  - Ensure the DSPs in each school meet once a year and receive Professional Learning.
  - Ensure that each school has a training programme using approved DCI materials and that safeguarding trainers receive Professional Learning.
  - Ensure that each school has two lead trainers, one native speaking and one English speaking, who lead the training and are part of the DCI Safeguarding Professional Learning framework.
  - Work with the Professional Learning leaders at each DCI school to ensure there is ongoing Safeguarding Professional Learning.
  - Ensure that child protection is integrated within safeguarding induction procedures for all new members of staff and volunteers.
  - Review and maintain online training materials

- Operational Practice and Strategic Development
  - Ensure that safeguarding is considered in the design, set-up, staffing and management of all DCI schools.
  - Ensure that the DCI Safeguarding Framework and approved Safeguarding Policy are followed across all DCI schools.
  - Develop contacts with external safeguarding professionals, along with outside agencies such as medical providers and embassies, who may be called on to consult.
  - Ensure each school carries out an annual audit and creates an action plan that is reported to the Board of Management.
  - Ensure that each school has a suitable number of DSPs and Deputy DSPs; this will vary depending on the size of the school.

The Designated Senior Person for DCI (DCI DSP) is Kate Beith (kate.beith@indulwich.com).

The Designated Senior Person for the China region is John Todd (john.todd@indulwich.com).

In her absence, the Director of Schools will assume the responsibilities of the DCI DSP: Marc Morris (marc.morris@indulwich.com)

4.3 Directors of DCI Functions and Departments

The Director of each DCI department will ensure that safeguarding is embedded into departmental practice, to include the design and set-up of new schools, recruitment, curriculum design and implementation, admissions and marketing.

4.4 School Safeguarding Leads

Each school shall have a Safeguarding Lead with overall responsibility for Safeguarding in the school. This person will:
- Be responsible for the school-specific Safeguarding Policy
- Lead the Safeguarding Working Party and Safeguarding Trainers

Safeguarding Lead Trainers

Each school will have Safeguarding Lead Trainers who will ensure that all staff are trained, using the DCI training materials, to follow the DCI Safeguarding framework and portfolio of policies.

5. Managing Concerns About Children

Each school shall have a Safeguarding Policy that defines its commitment to safeguarding children. The Safeguarding Policies shall follow the DCI Safeguarding Framework and policy template and be adapted to local conditions and where information specific to an individual school is to be inserted (e.g., names of staff members). The policy sets out clear expectations for each adult member of the school and will aim to give every member of staff clear guidance as to how all adults working with our children are expected to implement safer working practices. The policy defines the overall strategy and processes to promote an ethos of well-being, safety and security, and applies to all members of the DCI community. Each school shall provide safeguarding guidance to all visitors and volunteers who come into contact with our children and shall maintain a current copy of its Safeguarding Policy and the DCI Framework on its website.

Schools take a systematic approach to managing concerns, as set out in the following model:
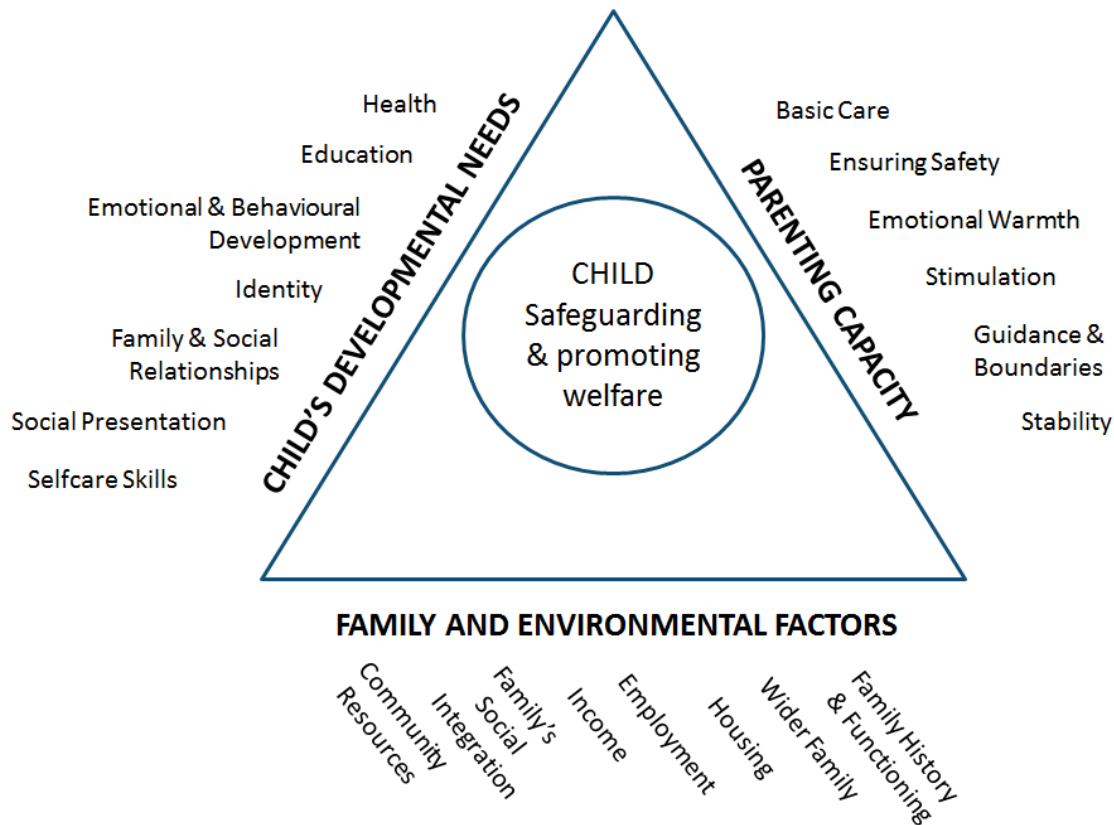
From UK HM Government, "Working together to safeguard children"

A concern about a child is recorded and monitored. If it is considered that a child in in immediate danger or at risk of harm then the school will follow the procedures and consider each case individually.

We also recognise that children can be abused by peers either online or in person and will record and manage any such concerns, ensuring that we use learning opportunities to minimise per on peer abuse and ensure children know how to report any concerns they may have. This will always be taken seriously and acted upon, under the appropriate policy e.g. safeguarding, bullying, not dismissed as 'banter' or 'part of growing up'. Victims will be supported through the College pastoral system.

6. Local Legislation

Each school should have due regard to local laws and regulations concerning the reporting of suspected instances of domestic abuse. Should a circumstance arise that may lead to a reporting obligation, guidance should be immediately sought from the DCI DSP (Designated Senior Person) who may consult with the DCI legal department.

7. Confidentiality

At all times consideration should be given to the need to respect the confidentiality of students, family members and adults, including staff and volunteers. However, the need to protect students supersedes confidentiality considerations when there is an unresolved and significant cause for concern. The process of reporting and recording concerns, as laid out in the policy for each DCI school, seeks to minimise the

risk to the reputation of colleagues and other adults while still protecting students at risk. All documentation is stored in secure dedicated spaces and has limited designated access.

8. Professional Learning Strategy

Every DCI school shall have a Safeguarding Professional Learning team consisting of:
- Two lead Safeguarding Trainers (one fluent in English, and one fluent in the local language) an appropriate number of Safeguarding Trainers.
- The Professional Learning Directors at each school shall support the Professional Learning in Safeguarding Programme.

Lead Safeguarding Trainers will:
- Follow the DCI Safeguarding Framework.
- Ensure Professional Learning is delivered by recognised Dulwich Safeguarding Trainers.
- Ensure the use of DCI-approved training materials.
- Attend Professional Learning annually with other Lead Safeguarding Trainers across the Colleges.
- Keep up to date with changes in policy.
- Assure the quality of training through observation and peer review.
- Ensure any local changes made to safeguarding materials are approved and sent to the DCI Lead Trainer.

Safeguarding Trainers will:
- Deliver approved Professional Learning as appropriate.
- Deliver Professional Learning in groups where appropriate.
- Attend meetings and Professional Learning as required.

All training materials will be kept in a designated central location.

9. Staff, Volunteers and Visitors

To ensure that children are protected while at our schools, DCMI and all DCI schools will carefully select, screen, train and supervise staff and volunteers. We accept that it is our responsibility to:

- Follow up at least one reference with a telephone call or personal contact, during which we will discuss the applicant's suitability to work with children before the employment contract is signed.
- Ensure that, before starting work, all adults with access to children at our schools have been checked by the Disclosure and Barring Service (DBS), or the equivalent service or bureau in the country where the teacher has been employed.

In addition, before a person takes up a position in we will:

- Ensure that the candidate's identity has been checked to establish that information given by the candidate is accurate.
- Verify that the candidate's qualifications are genuine.
- Obtain professional and character references before the employment contract is signed.
- Ensure that the candidate's health and physical capability are suitable to the position.
- Examine previous employment history and seek extra evidence to cover any gaps or lack of available police checks.

We recognise that some people who may be unsuitable for working with children may use volunteering as an opportunity to gain access to children. For this reason, DCMI and all DCI schools shall give all regular volunteers, in whatever capacity, the same consideration as contracted staff in regards to criminal record and identity checks. All regular volunteers will also receive the relevant level of safeguarding training.

Schools shall require parents or other volunteers who help on an occasional basis to work under the direct supervision of a member of staff and prevent them from having unsupervised contact with children. Volunteers must sign the Volunteer Safeguarding Statement (as approved by DCI), which will be appended to individual school policies.

At the beginning of each academic year, staff are required to sign the DCI Chid Protection Code of Conduct annually and this document is stored in each person's HR file. This document outlines expectations of appropriate adult behaviour towards children.

All visitors to the College will wear a College identity tag, be suitably supervised and given information about our Safeguarding Policy.

Any contractors will be expected to have proof of police checks and receive information about our safeguarding policy.

10. Prevent

The Prevent Duty places a statutory duty on education providers to identify children at risk of being drawn into radicalisation and terrorism. Each school shall have due regard to the social and cultural environment in which it operates in determining to what extent the Prevent Duty should be implemented.

11. Digital Safety

DCI recognises that most of our children will use mobile devices and computers at some time. They are a source of fun, entertainment, communication and education. However, we know that some men, women and young people use these technologies to harm children and that child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. The harm might range from sending hurtful or abusive texts and emails to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Each DCI school's Digital Safety Policy will explain what we do to keep firstly safe in school, including the safe use of photographic images of children. Cyber-bullying by children will be treated as seriously as any other type of bullying and will be managed according to the DCI schools' anti-bullying policies and procedures. Schools are encouraged to involve students and parents in policy formulation and review.

12. Internal and external events and activities

Risk assessments are expected in all colleges and high schools to ensure the best possible safety for children during internal and external events and activities. These assessments will include checking of external staff and guidance for staff leading and attending events and activities, referring to the DCI Educational Trips Policy where appropriate.

13. Audit Process

The audit process is designed to ensure that schools are implementing the DCI Safeguarding Framework and will identify areas for development. Each school will be audited annually, resulting

in an action plan that will form the safeguarding focus for the school for the next year. The Audit and Action Plan will be shared with the Board of Management. The Headmasters and Directors will report on the progress of their action plans to the Board of Management in the meeting before the next audit of the academic year. The Safeguarding Audit will cover the following areas:

- Child Protection Policy and Procedures
- Managing Allegations
- Digital Safety
- Professional Learning
- Partnerships with Parents and Caregivers
- Safer Recruitment
- Safeguarding and Child Protection in the Curriculum
- Positive/Preventive Curriculum
- Security/Facilities
- Boarding
- Inspection and Compliance

14. Links to related policies

In addition to addressing child protection concerns, we will ensure that children who attend DCI schools are kept safe from all types of harm while they are in our charge. To this end, each school's Safeguarding Policy must be hyperlinked to the following mandatory policies, which are taken from the DCI Headmasters' Safeguarding Checklist. Note that school-specific policy names may vary slightly from this list.

DCI Mandated Policies
- Safer Recruitment Policy
- CCTV Surveillance Policy
- The DCI Off-Site Educational Trips and Visits Policy (to include risk assessments)
- Health and Safety Policy**
- Managing Allegations

School Policies and Procedures
- Safer Recruitment Policy
- CCTV Surveillance Policy
- The DCI Off-Site Educational Trips and Visits Policy (to include risk assessments)
- Health and Safety Policy
- Fire Safety Policy
- Lockdown and other emergency procedures policies
- First Aid/Medical Procedures Policy
- Anti–bullying Policy
- Positive Behaviour Policy
- Procedures for recording sanctions on students
- Procedures for maintaining admissions and attendance registers
- E-Safety Policy